

FEDERAL SUBSISTENCE BOARD

WORK SESSION MEETING

TELECONFERENCE - ALASKA
JULY 16, 2020

MEMBERS PRESENT:

Anthony Christianson, Chairman
Rhonda Pitka, Public Member
Chad Padgett, Bureau of Land Management
Greg Siekaniec, U.S. Fish and Wildlife Service
Donald Striker, National Park Service
Gene Peltola, Bureau of Indian Affairs
David Schmid, U.S. Forest Service

Ken Lord, Solicitor's Office

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1 P R O C E E D I N G S

2
3 (Teleconference - 7/16/2020)4
5 (On record)6
7 (Operator instructions)8
9 CHAIRMAN CHRISTIANSON: Thank you,
10 Operator. Welcome everybody to this Thursday, July
11 16th work session for the Federal Subsistence Board,
12 and I thank everybody for taking their time to call in
13 and work on these special actions that we have before
14 us today.15
16 With that, you know, we, prior to the
17 meeting had executive session and just were looking at,
18 you know, just getting a brief overview of some legal
19 issues that -- to brief us and give us a short update
20 because some of us are all new Board members and just
21 to make sure that we're all on the same page as we look
22 at our agenda before us and start to make actions, and
23 so I appreciated that session there.24
25 So with that I'm going to go ahead and
26 open up the floor to review and adopt the agenda.27
28 MS. DETWILER: Mr. Chair, this is Sue.
29 Do you want me to quickly go over what's in the agenda?30
31 CHAIRMAN CHRISTIANSON: Yeah, Sue, if
32 you wouldn't mind, you can go ahead and just review the
33 agenda and then after we do review the agenda there we
34 can entertain a motion to adopt.35
36 MS. DETWILER: Okay, thank you. So
37 today's agenda we have five special actions and the
38 order that they're currently on the agenda, I will go
39 -- just briefly touch on each of those.40
41 The first one is Wildlife Special
42 Action 20-05 pertaining to moose in Unit 18.43
44 Next agenda item is Wildlife Special
45 Action 20-04 pertaining to caribou in Units 9, 17, 18
46 and 19.47
48 Next is Wildlife Special Action 20-01
49 pertaining to caribou in Unit 13.

50

1 MS. DETWILER: Okay.

2
3 Anthony Christianson, Chair.

4
5 CHAIRMAN CHRISTIANSON: Yes, I support
6 as stated.

7
8 MS. DETWILER: Okay. Motion passes
9 seven to zero.

10
11 And that will bring us to Wildlife
12 Special Action 20-03 pertaining to moose and caribou in
13 Unit 13 and, again, that's Lisa Maas.

14
15 CHAIRMAN CHRISTIANSON: We'll call on
16 Lisa to provide the analysis, thank you.

17
18 MS. MAAS: All right, thank you, Mr.
19 Chair. Again, for the record my name is Lisa Maas and
20 I'll be presenting a summary of the analysis for
21 Temporary Wildlife Special Action WSA20-03.

22
23 WSA20-03 was submitted by Kirk Wilson
24 of Glennallen and requests that the Federal Subsistence
25 Board close Federal public lands in Unit 13 to the
26 hunting of moose and caribou by non-Federally-qualified
27 users for the 2020/21 season.

28
29 The proponent states that this closures
30 is necessary due to extreme hunting competition from
31 high numbers of non-Federally-qualified users which
32 precludes a rural subsistence priority and results in
33 low harvest success by Federally-qualified subsistence
34 users. Because of this, the proponent states: action
35 is necessary to ensure the continuation of Federal
36 subsistence uses of moose and caribou in Unit 13 and
37 for reasons of public safety because there are too many
38 non-Federally-qualified users to safely hunt and pass
39 on customary and traditional harvest practices.

40
41 The proponent further states that this
42 request could serve as an experiment to evaluate the
43 potential of a Federal lands closure as a long-term
44 solution to increasing harvest success rates and
45 providing for the subsistence uses of Federally-
46 qualified subsistence users.

47
48 In 2002 the Board rejected Proposal
49 WP02-17 which requested closure of Federal lands in
50

1 Units 13A and 13B to moose and caribou hunting by non-
2 Federally-qualified users. The Board, Southcentral
3 Regional Advisory Council, InterAgency Staff Committee
4 and the Alaska Department of Fish and Game all opposed
5 this closure because it would not result in
6 conservation benefit due to the limited amount of
7 Federal public land in Unit 13 because additional
8 opportunity existed for Federal subsistence users to
9 hunt on Federal public lands after the State season
10 closed and because of the more liberal Federal harvest
11 limit and longer season.

12
13 In 2019 the Board rejected Temporary
14 Wildlife Special Action WSA19-03 which requested
15 closure of the Federal public land in Unit 13 to
16 caribou and moose hunting by non-Federally-qualified
17 users for the 2019/20 season. The Board determined the
18 requested closure was not warranted for conservation,
19 continuation of subsistence uses or safety reasons.
20 Federally-qualified subsistence users annual harvest
21 rates have remained fairly consistent in comparison to
22 the annual harvest rates by non-Federally-qualified
23 users. In addition the closure would not have
24 alleviated public safety concerns as non-Federally-
25 qualified users would still have been able to cross
26 Federal public lands to access State and private lands.

27
28 In September of 2019, ADF&G issued an
29 emergency order to extend the closing date for all
30 State caribou hunts in Unit 13 by 10 days to September
31 30th to help reduce the size of the Nelchina Herd.

32
33 Resident Hunters of Alaska submitted
34 written comments in opposition of WSA20-03 stating the
35 closure is not needed because the Nelchina is above
36 population objectives, additional harvest is needed and
37 ample opportunity exists for all hunters. A member of
38 the public also submitted written comments in
39 opposition to the request stating that public lands are
40 for all members of the public, not just some, and
41 plenty of hunting opportunity already exists. ADF&G
42 submitted written comments on WSA20-03 stating no
43 conservation concerns exists for either moose or
44 caribou in Unit 13 and hunting pressure has not been
45 shown to displace moose or caribou from traditional
46 migration corridors. ADF&G further commented that a
47 closure would not likely affect hunting success of
48 Federally-qualified users or address public safety
49 concerns.

50

1 During the public hearing for WSA20-03
2 13 people testified, five in opposition, and seven in
3 support. Opposition to the request included a lack of
4 need because no conservation concerns exist and that
5 public lands should be open to everyone. Several
6 supporters of the request referenced Title VIII of
7 ANILCA calling for a rural subsistence priority. One
8 testifier pointed out that ADF&G has extended the
9 State's fall caribou season in recent years precluding
10 a rural priority from a longer fall season. Other
11 testifiers mentioned that Federal lands in Unit 13 only
12 compromise a small portion of the unit and State
13 hunters have plenty of other areas to hunt while other
14 Federal lands in the area are difficult to access.
15 Another testifier stated that law enforcement was a
16 major reason the Board rejected WSA19-03, however,
17 enforcement is an agency issue and not a reason for the
18 Board to reject or approve a request under ANILCA.

19
20 The proponent of this request testified
21 that the influx of caribou hunters during moose season
22 takes away moose hunting opportunity from Federally-
23 qualified subsistence users. He further stated that
24 the area is too crowded to safely hunt as people aim
25 guns at one another and shoot over people's heads.

26
27 Several other testifiers echoed these
28 safety and overcrowding concerns. One stated he no
29 longer hunts in the area because of the terrible
30 overcrowding.

31
32 The relevant caribou biology was just
33 presented as part of WSA20-01 so I will move on to
34 moose.

35
36 Moose populations in Unit 13 have grown
37 since 2001. Since 2008 the Unit 13 moose population
38 has been within State management objectives. In 2019
39 the unit-wide population estimate was 19,000 moose.
40 However, the Unit 13 moose population dropped below
41 subunit population objectives in 2013 where it has
42 remained. Fall bull/cow ratios have been above State
43 management objectives since 2004, however, the lowest
44 bull/cow ratios have been found in the most accessible
45 portions of each subunit. Calf/cow ratios have been
46 below State management objectives since 2001 only
47 averaging 20 calves per 100 cows, however, despite
48 these low ratios population estimates demonstrate a
49 gradually increasing population trend.

50

1 hunts, and unsafe shooting practices have been
2 repeatedly stated by all user groups. While these
3 concerns may be better addressed through increased law
4 enforcement or restrictions along road sides, these
5 options have not been implemented and are outside of
6 the Board's authority. These safety concerns have been
7 an issue for decades and have resulted in displacement
8 of Federally-qualified subsistence users who do not
9 feel safe hunting in the area.

10
11 The OSM conclusion is to support
12 Temporary Special Action WSA20-03 with modification to
13 close Federal public lands to moose and caribou hunting
14 by non-Federally-qualified users in Units 13A and 13B
15 only for the 2020/22 regulatory cycle. Extending this
16 request to the 2021/22 regulatory year will reduce the
17 administrative burden associated with processing
18 special action requests. A proposal for this closure
19 could not take effect until July 1st, 2022, and that
20 this has been an issue for decades, no change in the
21 situation are expected between this year and next year.

22
23 Thank you, Mr. Chair.

24
25 I'd be happy to answer any questions.

26
27 CHAIRMAN CHRISTIANSON: Thank you for
28 the analysis, Lisa. Any questions for Lisa.

29
30 MR. PELTOLA: Mr. Chair, BIA.

31
32 CHAIRMAN CHRISTIANSON: You have the
33 floor.

34
35 MR. PELTOLA: Thank you, Mr. Chair.
36 So, Lisa, I was looking back through the analysis for
37 our previous special action that the Board addressed
38 and going to this one and I couldn't find anything in
39 the analysis for this so I was wondering if you could
40 answer some questions for me.

41
42 With regard to caribou harvest in GMU
43 23, if I look at the State reg books it says we have
44 RC561, RC562, we have a community harvest system CC001
45 permit that we have a drawing, VC485, could you tell me
46 how many permits have been issued for caribou under
47 those various scenarios?

48
49 MS. MAAS: Gene, I don't think I --

50

1 hold on, I don't think I have that information offhand,
2 like just by permit, so under Federal -- I mean Federal
3 harvest is by FC1302.

4

5 MR. PELTOLA: Correct.

6

7 MS. MAAS: And so I can give you
8 numbers for Federal harvest under FC1302 and then I can
9 give you numbers for like total state harvest, but I
10 don't have numbers, you know, offhand for different
11 State hunts.

12

13 MR. PELTOLA: So what I was looking at
14 was that so during the analysis you gave the history
15 about -- I'm sorry, you gave the history of GMU13,
16 sorry about that, and then part of that history was the
17 Board addressed a similar proposal 19-03 which was
18 rejected by the Board, so over the years the Board has
19 been exposed to heavy competition, and heavy
20 competition can be reflective of then, because this is
21 a regular -- a permit hunt in different capacities, the
22 competition could be regulated or addressed via permit
23 issuance, if there is a perception of, or realized
24 heavy competition, then a reduction of permits could be
25 utilized to reduce that potential competition. Safety
26 per the terms, the place is flooded, a lot of
27 competition, people aren't hunting there because
28 there's so many people, a safety aspect could be
29 addressed by a reduction in permits. So what I'm
30 trying to get at is there are permits issued for this
31 hunt in GMU13 from the Federal program and the State
32 program, so I was trying to find something with regard
33 to how many permits are issued in the Federal program
34 and the State program to see if there's actually been a
35 reduction in permits, therefore, a potential reduction
36 in the competition or safety concern. And the reason I
37 ask that is in the State's correspondence in the
38 previous, in the May 20th letter from the Department,
39 under Unit 13 caribou hunt structure for regulatory 18
40 -- RC561 had 4,586 permits, a quota of 500; RC562 had
41 4,181 permits, a quota of 500, CC01 had 838 permits for
42 a quota of 400, VC45 had 5,000 permits for a quota of
43 250.

44

45 And so I was, you know, quickly adding
46 up, that's eight, nine, 14, 17 -- roughly 17,000
47 permits issued so I was just trying to see if the trend
48 had been increasing, decreasing, or remaining the same
49 with regard to those permit issuances.

50

1 Thank you much.

2
3 Mr. Chair.

4
5 MS. MAAS: Through the Chair. I can
6 give you numbers of hunters, which is kind of a
7 reflection on numbers of permits and, I mean, you may
8 be aware that the RC permits, I mean they are a
9 registration permit but there's some limitations on
10 there like if you get that permit through the State you
11 can only hunt caribou in Unit 13 and nowhere else in
12 the state, whereas, if you get that draw permit you can
13 hunt caribou in Unit 13 and anywhere else. So it's
14 just, you know, kind of a benefit, you know, if people
15 are able to get that draw permit, it gives them more
16 flexibility and opportunity.

17
18 So for the Federal caribou hunt, hunter
19 numbers has only slightly increased. Between 2001 and
20 2009, the number of hunters under Federal regulations
21 was 1,322 and between 2010 and 2018 hunter numbers
22 averaged 1,469 hunters. So that was just a slight
23 increase under Federal regulations.

24
25 And then, again, I mean State -- yeah,
26 I could probably get you the State hunter numbers but
27 it's going to take me a moment.

28
29 MR. PELTOLA: Yeah, Mr. Chair, if I
30 may, BIA again. Under that same letter dated May 20th,
31 2020, under GMU13, at least regard to regulatory 18,
32 for those hunts I cited a number of permits issued,
33 they also have number of hunted permits and that's kind
34 of reflective of, you know, those that received a
35 permit, did not hunt, so RC561 is 1,7(indiscernible)
36 hunted, RC562 is 2,080 hunted, CC001 was 376 hunted,
37 VC45 was 1,233 and so that comes up with a total just
38 shy of 5,500 hunters.

39
40 Thank you, Mr. Chair.

41
42 CHAIRMAN CHRISTIANSON: Any other
43 questions for the Staff.

44
45 MR. SIEKANIEC: Mr. Chair, this is
46 Greg.

47
48 CHAIRMAN CHRISTIANSON: Greg, go ahead.

49
50

1 MR. SIEKANIEC: Thank you. Lisa,
2 thanks for the analysis and the reminder on kind of
3 this necessary portion of it and unnecessary
4 restrictions on non-subsistence users. So I think,
5 like Gene has been doing, I'm looking for, well, we
6 said in '19, no, we didn't think it was appropriate to
7 close this so -- and I think I heard you say that
8 earlier we had -- the Board had passed an additional
9 window of time, I think September 21 to the 30th, for
10 Federally-qualified users but that has been since
11 matched by the State, probably because of what caribou
12 are doing and probably additional opportunity due to
13 the herd, is that, in your opinion, another option that
14 if we limited to Federally-qualified -- or we closed it
15 to non-Federally-qualified users during September 21 to
16 the 30th, would that provide that additional
17 opportunity that people are looking for in this
18 particular area of 13A and B?

19
20 CHAIRMAN CHRISTIANSON: Lisa.

21
22 MS. MAAS: Yes, thanks for that
23 question. Sorry, I'm just finding that spot in the
24 analysis. So, yeah, Member Siekaniec pointed out
25 another alternative considered was to close Federal
26 public lands in Unit 13 to non-Federally-qualified
27 users only from September 21st to 30th, the State
28 caribou season usually ends on September 20th, whereas
29 the Federal caribou season ends September 30th; however
30 in recent years ADF&G has extended the State caribou
31 season until September 30th precluding the Federal
32 subsistence priority from that longer season. Closing
33 Federal public lands during this time period would help
34 preserve a Federal subsistence priority even if the
35 State extends its season, however, this alternative
36 would not address the immense competition and safety
37 concerns occurring earlier in the season for both moose
38 and caribou. So, yeah, I think that would probably
39 help the issue but it wouldn't be a complete solution
40 addressing the local subsistence users concern for that
41 immense competition and safety. And, again, I mean
42 that's only considering the caribou season and the
43 moose season, which also experiences a lot of
44 overcrowding competition ends September 20th, so that
45 alternative would not really address the moose hunt at
46 all, it would just partially address the caribou hunt.

47
48 MR. SIEKANIEC: Thank you, Lisa. Other
49 than, you know, the moose season as I think I've been
50

1 told by many of our managers is that, you know, the
2 real key time window, though, a lot of people like to
3 be hunting moose is about the September 19th through
4 the end of the month, so I think there is some
5 consideration that would be significant overlap there
6 that could take some of the pressure off of this
7 particular area.

8
9 My concern, Lisa, as I'm -- you know,
10 I'm not hearing anything being recommended different
11 than what we had dealt with in '19, other than maybe we
12 reduce size of the units to just A and B.

13
14 So, anyway, thank you, Mr. Chair and
15 Lisa for your comments.

16
17 MS. MAAS: Through the Chair, if I
18 could respond to that.

19
20 CHAIRMAN CHRISTIANSON: Go ahead, Lisa.

21
22 MS. MAAS: Yeah, thank you, Mr. Chair.
23 So just a clarification Member Siekaniec. Both the
24 Federal and State moose seasons in Unit 13 end
25 September 20th.

26
27 MR. SIEKANIEC: Oh, they do, okay,
28 thank you.

29
30 MS. MAAS: yeah, and just in Unit -- in
31 2019 the OSM recommendation was to close the entire
32 unit, whereas this year we really honed in to the
33 problem area and so instead of closing all of Unit 13,
34 we're recommending closing, you know, only the BLM
35 lands in Units 13A and 13B where most of the conflicts
36 occur. So that's one difference between 2019 and 2020.
37 And during the Board's deliberation in 2019 there were
38 some questions from Board Members about the possibility
39 of a targeted closure and so that helped, you know,
40 lead or define the OSM analysis this time around, was
41 that thought or desire for, you know, a possible
42 targeted closure when it might not be necessary to
43 close the entire unit.

44
45 Thank you.

46
47 MR. SIEKANIEC: Mr. Chair, this is Greg
48 again.

1 So, Lisa, when I'm going through this, if I understand
2 this correctly, the general request was that the
3 Federal Subsistence Board close Federal public lands in
4 GMU 13 to the hunting of moose and caribou by non-
5 Federally-qualified users for the 20/21 season...and
6 the OSM recommendation is to close Federal public lands
7 to the hunting of caribou and moose, as opposed to the
8 whole unit, if I read that correctly then can you
9 articulate what is the difference with regard to
10 percentile of Federal lands in comparison to the whole
11 GMU?

12
13 MS. MAAS: Yeah, thanks Member Peltola.
14 So the BLM lands in Unit -- or sorry, Federal public
15 lands comprise 12.4 percent of Unit 13, although six
16 percent of these are part of Denali National Park so
17 they're already essentially closed to non-Federally-
18 qualified users, so we're talking about 6.4 percent of
19 Unit 13 that would be closed if this special action was
20 approved as submitted. And the OSM modification is
21 talking about closing 2.7 percent of the land so that's
22 a difference of, you know, 3.5 percent, you know, from
23 6.4 to 3 -- to 2.7 percent.

24
25 So we're not closing any lands in Units
26 13E, 13C, or 13C.

27
28 MR. PELTOLA: Okay, thank you. And,
29 Mr. Chair, if I may for a followup.

30
31 CHAIRMAN CHRISTIANSON: Go ahead, Gene.

32
33 MR. PELTOLA: Thank you, Mr. Chair.
34 So, Lisa, if -- and I'm saying this just to make sure
35 that I am thinking properly, so if the Board was to act
36 upon this, there'd be roughly three to six percent of
37 the lands within the Game Management Unit, which would
38 not be available to Federally-qualified users, although
39 those are the most accessible lands, and then with that
40 being said, a closure to all but Federally-qualified
41 users would not preclude a non-Federally-qualified user
42 from camping on that land, transitioning to that land,
43 through that land, similar to like Haul Road on the
44 Slope, there's a five mile buffer on each side, there's
45 nothing that precludes you from camping it,
46 transitioning through it, going to non-Federal lands,
47 and in this case with the proposal we're looking at, an
48 individual would have to transition through those lands
49 to get to lands which are open, so there still would be

50

1 and provide for a meaningful subsistence priority.
2 Modifying the request to extend the closure for the
3 entire 2020/2022 regulatory cycle will help to reduce
4 the administrative burden associated with repeated
5 requests.

6
7 The Board may want to consider adding
8 some criteria that should be measured to determine if
9 the closure is successful. Examples might include
10 harvest success of Federally-qualified users,
11 congestion at parking areas, and along roads, et
12 cetera. Issues related to unsafe shooting practices
13 and other user conflicts may be alleviated by this
14 closure when coupled with law enforcement efforts.
15 However, it is unclear how effective a closure may be
16 in the area. Such a closure would not prevent non-
17 Federally-qualified users from accessing BLM lands in
18 order to travel from the road to State managed lands in
19 order to attempt to harvest moose and caribou.
20 Additionally boundaries between State and Federal lands
21 in Unit 13 are ill-defined, which makes navigating such
22 a closure potentially difficult.

23
24 Thank you, Mr. Chair.

25
26 CHAIRMAN CHRISTIANSON: Thank you,
27 Lisa. Any questions for the ISC.

28
29 (No comments)

30
31 CHAIRMAN CHRISTIANSON: All right,
32 hearing none, we'll move on. RAC discussions.

33
34 MS. MAAS: Yeah, Mr. Chair, there were
35 no Council recommendations for this special action.

36
37 CHAIRMAN CHRISTIANSON: Thank you.
38 Orville.

39
40 MS. DETWILER: Yeah, Mr. Chair, my
41 understanding is they may not -- the Councils may not
42 have had a chance to comment on these, I could be
43 wrong, but I just didn't want to get past that stage of
44 our review without making sure that they -- even though
45 they didn't have a recommendation, that they have
46 subsequently reviewed it and may have something to say.

47
48 MS. STICKWAN: May I say something, Mr.
49 Chair, this is Gloria.

50

Mckinney, Kayla T

From: Maas, Lisa <Lisa_Maas@fws.gov>
Sent: Wednesday, June 24, 2020 5:14 PM
To: Mckee, Caron A
Subject: Re: News Release: Federal Subsistence Board takes action on Emergency Fisheries and Wildlife Special Action Requests FSA20-04 (Copper River salmon), FSA20-05 (Kuskokwim River salmon) and WSA19-14 (Unit 3 moose and deer)

Thanks so much, Caron!

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Lisa Maas  
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 907-786-3357

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**From:** Mckee, Caron A <caron\_mckee@fws.gov>  
**Sent:** Wednesday, June 24, 2020 4:56 PM  
**To:** FW7 Subsistence <FW7\_Subsistence@fws.gov>  
**Cc:** Clark, Karen <karen\_clark@fws.gov>; Boario, Sara D <sara\_boario@fws.gov>  
**Subject:** News Release: Federal Subsistence Board takes action on Emergency Fisheries and Wildlife Special Action Requests FSA20-04 (Copper River salmon), FSA20-05 (Kuskokwim River salmon) and WSA19-14 (Unit 3 moose and deer)

**For Immediate Release:**  
 June 24, 2020

## **Federal Subsistence Board takes action on Emergency Fisheries and Wildlife Special Action Requests FSA20-04 (Copper River salmon), FSA20-05 (Kuskokwim River salmon) and WSA19-14 (Unit 3 moose and deer)**

In a June 22, 2020 teleconference, the Federal Subsistence Board (Board) discussed and took action on three Emergency Special Action Requests. The Board rejected FSA20-04 and FSA20-05, and approved WSA19-14.

The Board rejected FSA20-04, requesting a dipnet, and rod and reel fishery on the lower Copper River, citing opposition from the two affected Federally recognized Tribes and the Cordova City Council. The Board noted that there is a similar Fisheries proposal currently being considered, and that this proposal will provide more public process on this issue before a decision is made.

The Board rejected FSA20-05, requesting closure of Federal public waters of the Kuskokwim River drainage to the harvest of Chum and Sockeye Salmon by non-Federally qualified subsistence users. The Board considered the closure to be an unnecessary restriction on non-Federally qualified users because no conservation concerns exist for either Chum or Sockeye Salmon in the Kuskokwim River drainage. Conservation measures to conserve Chinook Salmon, such as early season closures, windowed harvest opportunities, and restricted net requirements, will continue to be implemented, in close coordination with the requests of the Kuskokwim River Inter-Tribal Fish Commission, the Alaska Department of Fish and Game, and other users. These efforts continue to afford pre-cautionary and conservative Chinook Salmon harvest opportunities that allow for the continuation of subsistence uses, and align with current in-season indicators.

The Board approved WSA19-14, which requested an emergency moose and deer season for the community of Kake in Unit 3. The Board approved an up to 60 day season during summer 2020 for the community of Kake, with a community harvest limit of up to 4 bull moose and up to 10 male Sitka black-tailed deer. The hunt will be administered by the U.S. Forest Service, Petersburg District Ranger. The Board supported this emergency season for reasons of public safety related to food security concerns in Kake due to intermittent and unreliable food deliveries. The Board noted that no conservation concerns exist for resources as a result of this request.

Additional information on the Federal Subsistence Management Program may be found on the web at [www.doi.gov/subsistence](http://www.doi.gov/subsistence) or by visiting [www.facebook.com/subsistencealaska](https://www.facebook.com/subsistencealaska).

**Missing out on the latest Federal subsistence issues?** If you'd like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing [fws-fsb-subsistence-request@lists.fws.gov](mailto:fws-fsb-subsistence-request@lists.fws.gov).

-###-

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THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Fish and Game

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July 7, 2020

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David Schmid  
Chief Forester  
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Dear Ms. Detweiler & Mr. Schmid:

I am writing to express my disappointment over hearing that the Alaska Department of Fish & Game's (ADF&G) request to require hunters from the Organized Village of Kake provide commonly collected hunt and harvest information for the special hunt authorized by the Federal Subsistence Board was denied.

The information the ADF&G asked the United States Forest Service to require the Organized Village of Kake to report on animals taken under the recently authorized emergency federal hunt for moose and deer is standard information collected on all big game hunts. Kake hunters are required to report the same information on state-issued deer harvest tickets and registration permits for the RM038 moose hunt under which they hunt each fall. Similar information is also collected from samples of small game hunters and for cultural education and scientific collecting permits.

These data are used in conjunction with population, composition, and habitat data to make informed management decisions ensuring the sustainability of the harvest and populations. These reports are a great opportunity for hunters to collaborate on managing populations by providing direct observations of the status of populations and habitat. In Unit 3 moose and deer populations cannot be surveyed from the air due to dense canopy cover, so ADF&G depends on other indices of abundance and trend including reports from hunters. Information provided by hunters is among the most valuable information we have for managing moose and deer in Unit 3. For example, hunter data led to liberalizing the RM038 moose antler restrictions. Reports of antler configurations, antler spread, moose age, and photos gave ADF&G the confidence to propose the regulatory change expanding allowable configurations to include bulls with 2 brow tines on each side of the antlers. RM038 now has the most liberal antler restrictions in the state, which allow for ample harvest opportunity while also allowing the moose population to continue expanding. Hunter report data also inspired ADF&G's support for and the Board of Game's 2019 decision to extend deer hunting season in Unit 3.

Knowing harvest effort (number of hunters, days hunted), location (hunted and harvested), transportation, number of animals taken, and date of kill provide insight to the appropriate level of utilization of a species. Most hunting seasons, bag limits, and area specific regulations are based on these routinely collected data, not only in Alaska but across the nation.

Further, if hunter privacy is a concern as stated in the additional correspondence we received from the Office of Subsistence Management, Alaska Statute (AS 16.05.815) requires the ADF&G to maintain harvest information confidential. We are prohibited from releasing the information that connects a hunter to harvest. The data we do collect are stored in the department's harvest data base. However, when those data are publicly reported personal hunter information (names, addresses, etc.) is specifically omitted.

Withholding names of successful hunters and dates when game was harvested will also frustrate appropriate application of the bag limits set by state and federal boards. Individual bag limits established through public processes serve two purposes; they help ensure harvest remains sustainable and they provide all hunters with a sense that the opportunity to harvest a public resource like game has been fairly allocated. When one user group feels like they have been excluded from that process or unfairly treated they may seek redress through legislative or legal action to change the laws and regulations used to authorize that harvest.

This refusal to provide commonly collected information risks upsetting the solid working relationship our agencies have been building over the years, and I strongly urge you to reconsider this decision.

Sincerely,



Ben Mulligan  
Deputy Commissioner

cc: Steve Wackowski, Senior Advisor for Alaska Affairs, US Department of the Interior  
George Pappas, State Liaison, Office of Subsistence Management  
Edward Grasser, Director of Wildlife Conservation, Alaska Department of Fish & Game  
Cheryl Brooking, Assistant Attorney General, Alaska Department of Law  
Ryan Scott, Assistant Director, Alaska Department of Fish & Game  
Mark Burch, Federal Subsistence Liaison, Alaska Department of Fish & Game  
Tom Schumacher, Regional Supervisor, Division of Wildlife Conservation, Alaska  
Department of Fish & Game



U.S. Fish and Wildlife Service  
Bureau of Land Management  
National Park Service  
Bureau of Indian Affairs

## Federal Subsistence Board

1011 East Tudor Road, MS 121  
Anchorage, AK 99503-6199



Forest Service

# COVID-19 FOOD SECURITY COMMUNITY HARVEST FOR THE ORGANIZED VILLAGE OF KAKE

## EMERGENCY SPECIAL ACTION

Under Authority of: 36 CFR 242.10 and .19  
50 CFR 100.10 and .19

Emergency Special Action No: WSA19-14

Issued at: Petersburg Alaska, June 24, 2020

Effective Date: 12:01 a.m. Wednesday, June 24, 2020

Expiration Date 11:59 p.m. Monday, Aug 22, 2020 unless superseded by subsequent special action

**EXPLANATION:** This Emergency Special Action authorizes a Kake community harvest permit allowing the Organized Village of Kake to harvest up to 2 antlered bull moose and 5 male Sitka black-tailed deer per month from Thursday, June 24, 2020 to Sunday, August 22, 2020. Participation in the season is limited to Federally qualified subsistence users selected by the Organized Village of Kake. Harvest levels, up to the maximum harvest set by this special action, will be dictated by the in-season manager on the harvest permit. A 30 day review by the in-season manager will determine the need for an additional 30 day harvest limit for a total community harvest of up to 4 antlered bull moose and 10 male deer.

**REGULATION:** 36 CFR §242.26(n)(3) and 50 CFR §100.26(n)(3) are temporarily modified to read:

### Unit 3 – Moose

*1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on either antler, or antlers with 2 brow tines on both sides by State registration permit only* Sep. 15-Oct. 15.

*Kupreanof Island, that portion west of the Portage Bay-Duncan Canal Portage – Community harvest limit of up to 4 antlered bull moose for the community of Kake by Federal community harvest permit only* June. 24-Aug. 22.

### Unit 3 -- Deer

*Unit 3-Mitkof, Woewodski, and Butterworth Islands – 1 antlered deer* Oct. 15-31.

*Unit 3-Kupreanof Island, that portion east of the Portage Bay-Duncan Canal Portage – 1 antlered deer* Oct. 15-31.



*Unit 3, remainder – 2 antlered deer*

*Aug. 1 - Nov. 30.  
Dec. 1 - Dec. 31,  
Season to be  
announced.*

*Unit 3-Kupreanof Island, that portion west of the Portage Bay-Duncan Canal Portage – Community harvest limit of up to 10 bucks for the community of Kake by Federal community harvest permit only*

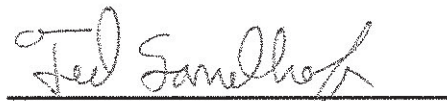
*June. 24-Aug. 22.*

### **JUSTIFICATION:**

On June 22, 2020, the Federal Subsistence Board approved WSA19-14, which requested an emergency moose and deer season for the community of Kake in Unit 3. The Board approved an up to 60 day season during summer 2020 for the community of Kake, with a community harvest limit of up to 4 bull moose and up to 10 male Sitka black-tailed deer. The hunt will be administered by the U.S. Forest Service, Petersburg District Ranger. The Board supported this emergency season for reasons of public safety related to food security concerns in Kake due to intermittent and unreliable food deliveries caused by the COVID-19 pandemic and limited ferry service. The Board additionally noted that no conservation concerns exist for resources as a result from this request.

The community harvest presents no known conservation concern for the growing population of moose and stable population of Sitka black-tailed deer in the harvest area. Harvest is restricted to bulls and bucks to reduce the impact to the population. In 2019, the State registration hunt reported 55 bulls harvested from Kupreanof Island, including 26 from the Kake/Rocky Pass area. This special action does not affect the regular State or Federal seasons. Unit 3 moose and deer season will remain closed, with the exception of the Kake community harvest, unless opened by past or future special action.

Federal Subsistence Board by delegation to:



Ted Sandhofer  
District Ranger  
Petersburg Ranger District  
June 24, 2020

### **DISTRIBUTION:**

#### **GOVERNMENT ORGANIZATIONS**

Anthony Christianson, Chair, Federal Subsistence Board; Southeast Alaska Regional Advisory Council; ADF&G Wildlife Conservation Division-Petersburg; Jordan Rymer, Subsistence L.E.O., USFS – Moose Pass; Joseph Boggs, L.E.O., USFS-Petersburg; Bill Elsner, L.E.O., USFS-Ketchikan; Paul Robbins, Public Affairs, USFS-Ketchikan; Terry Suminski, Tongass Subsistence Program Leader, USFS-Sitka; DeAnna Perry, Council Coordinator, USFS – Juneau; Melinda Hernandez-Burke, Tribal Relations Program Manager, USFS – Juneau; Sue Detwiler, Lisa Maas, Caron McKee, and George Pappas, Office of Subsistence Management; Alaska Public Safety Department-Fish & Wildlife Protection Division, Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game; Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game – Wrangell; David Jack, Mayor of Wrangell; Mark Jensen, Mayor of Petersburg; Richard Oliver, Wrangell Cooperative Association; Tracy Welch, Petersburg Indian Association.

## Mckinney, Kayla T

---

**From:** Detwiler, Sue K  
**Sent:** Thursday, August 6, 2020 3:57 PM  
**To:** Mulligan, Benjamin J (DFG)  
**Cc:** Thomas C Doolittle (thomas\_doolittle@fws.gov)  
**Subject:** RE: [EXTERNAL] Request Letter - Further Clarification on GMU 13 Closure FAQs

Ben,  
We're working on a response and will get it to you as soon as possible.

I'm going to be out of the office tomorrow (Friday 8/7), but Tom Doolittle will be in.

Sue

Sue Detwiler  
Assistant Regional Director - Subsistence  
U.S. Fish & Wildlife Service- Alaska Region  
1011 E Tudor Rd  
Anchorage, AK 99503  
Sue\_Detwiler@fws.gov  
(907) 444-4321 cell

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**From:** Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>  
**Sent:** Thursday, August 6, 2020 7:33 AM  
**To:** Detwiler, Sue K <sue\_detwiler@fws.gov>  
**Subject:** [EXTERNAL] Request Letter - Further Clarification on GMU 13 Closure FAQs

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Sue,

Attached you will find a letter from the Alaska Departments of Fish & Game and Natural Resources requesting further clarification on FAQ #5 that was released last Friday as part of a news release on the closure of federal lands to non-federally qualified users. As you'll see in the letter I initially reached out to Lisa Maas via email and she got back to me right away, but her response has now prompted further clarification and this more structured request that I felt should be addressed to you.

Best regards,

Ben Mulligan



**STAFF ANALYSIS  
TEMPORARY SPECIAL ACTION  
WSA20-03**

**ISSUES**

Temporary Special Action Request WSA20-03, submitted by Kirk Wilson of Glennallen, requests that the Federal Subsistence Board (Board) close Federal public lands in Unit 13 to the hunting of moose and caribou by non-Federally qualified users for the 2020/2021 season.

**DISCUSSION**

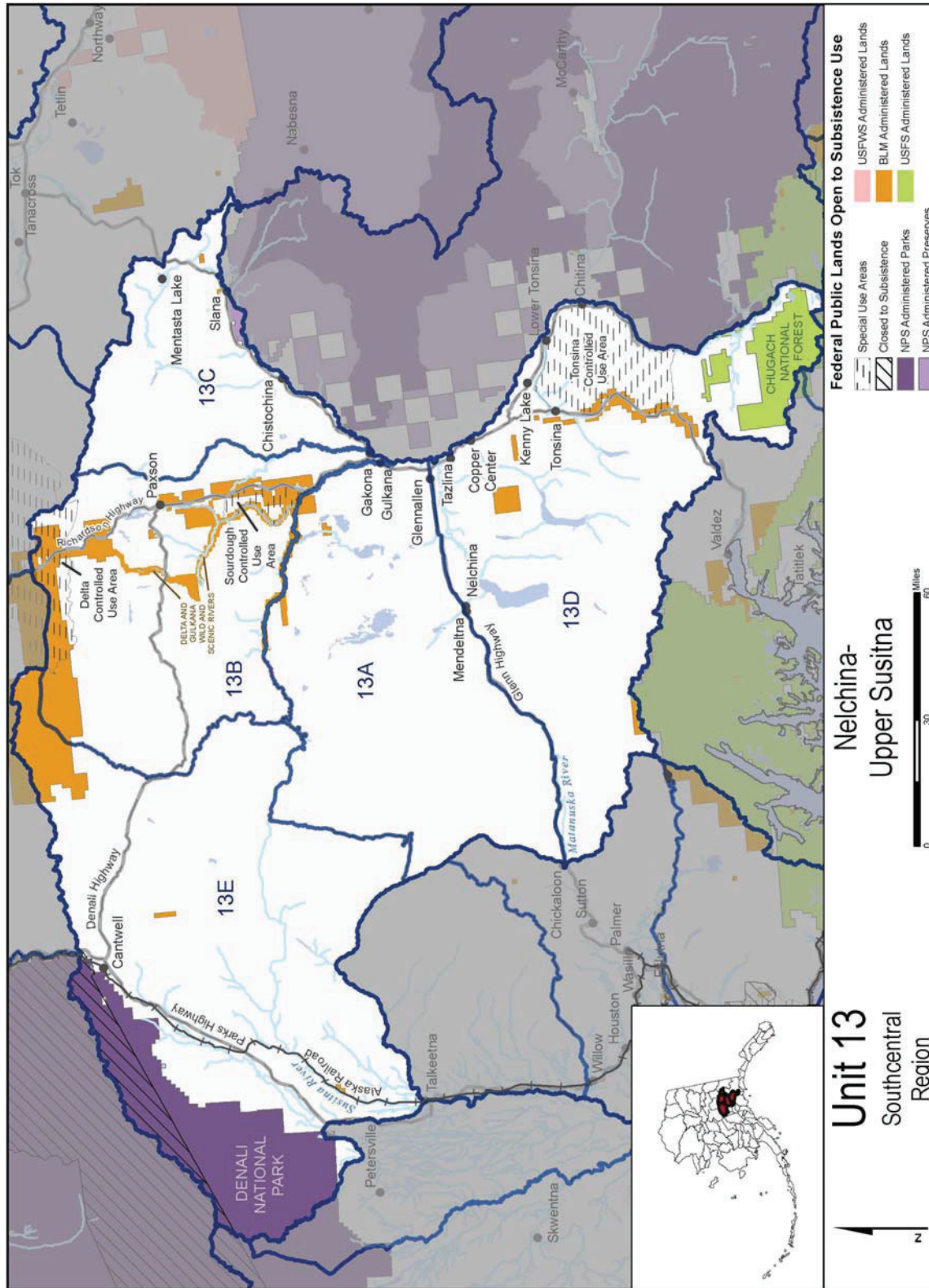
The proponent requested this Temporary Special Action to evaluate whether subsistence harvests and success rates of Federally qualified subsistence users will improve if Federal public lands are closed to moose and caribou hunting by non-Federally qualified users. The proponent states that this closure is necessary due to extreme hunting competition from high numbers of non-Federally qualified users, which precludes a rural subsistence priority and results in low harvest success by Federally qualified subsistence users. Because of this, the proponent states action is necessary to ensure the continuation of Federal subsistence uses of moose and caribou in Unit 13. The proponent also states that a closure is needed for reasons of public safety because there are too many non-Federally qualified users “to provide reasonable harvest success by Federally qualified subsistence users to safely continue Federal subsistence moose and caribou hunting and to ensure passing on customary and traditional harvest and use practices.” He also notes that rural residents have not been able to meet their subsistence needs for years.

The proponent further states that this request could serve as an experiment to evaluate the potential of a Federal lands closure as a long-term solution to increasing harvest success rates and providing for the subsistence uses of Federally qualified subsistence users. The proponent also lists other concerns related to the high hunter numbers in Unit 13 including: litter, habitat degradation from off-road vehicle traffic, trespass on private lands, disruption of animal movements, over-crowded hunting conditions, and concentration of local and non-local hunters on the limited amount of Federal lands, which are easily accessible and provide greater opportunities for encountering moose and caribou due to their location.

The applicable Federal regulations are found in 36 CFR 242.19(b) and 50 CFR 100.19(b) (Temporary Special Actions) and state that:

*... After adequate notice and public hearing, the Board may temporarily close or open public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for subsistence take, or close public lands for the taking of fish and wildlife for nonsubsistence uses, or restrict take for nonsubsistence uses.*





Map 1. Unit 13

## Appendix 1



THE STATE  
of ALASKA  
GOVERNOR MICHAEL I. DUNLEAVY

## Department of Fish and Game

OFFICE OF THE COMMISSIONER  
Headquarters Office

1255 West 8<sup>th</sup> Street  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Main: 907.465.6136  
Fax: 907.465.2332

## MEMORANDUM

|       |                                                          |          |                                          |
|-------|----------------------------------------------------------|----------|------------------------------------------|
| TO:   | Anthony Christianson, Chair<br>Federal Subsistence Board | DATE:    | May 20, 2020                             |
| FROM: | Ben Mulligan <i>BJM</i><br>Deputy Commissioner           | PHONE:   | 267-2190                                 |
|       |                                                          | SUBJECT: | Wildlife Special<br>Actions 01, 02, & 03 |

The Alaska Department of Fish and Game (ADF&G) has reviewed Wildlife Special Actions WSA20-01, WSA20-02, WSA20-03. Temporary Special Action Request WSA20-01, submitted by William Amburg, requests a continuous caribou season in Unit 13 from Aug. 1-Mar. 31, and that the caribou harvest limit in Unit 13 remainder be changed to two caribou for the 2020/21 and 2021/22 seasons. Temporary Special Action Request WSA20-02, submitted by the Ahtna Intertribal Resource Commission, requests the development of a community harvest system for moose and caribou in Units 11, 12, and 13. Given the Board's recent action on Wildlife Proposal WP18-19, only the Unit 12 requests will be considered in the analysis for this special action. Temporary Special Action Request WSA20-03, submitted by Kirk Wilson, requests that the Board close Federal public lands in Unit 13 to the harvest of moose and caribou except for Federally qualified subsistence users for the 2020/21 season.

The State of Alaska, Department of Fish and Game (ADF&G) appreciates the opportunity to provide comments on these Special Action requests.

**Background****Caribou**

ADF&G maintains the Nelchina caribou herd with the objective of 35,000–40,000 animals remaining in the herd after the fall hunting season. The strategy behind this objective is to maintain the herd below carrying capacity to prevent overgrazing of summer or winter range and allow for a relatively stable level of harvest annually. Caribou herds typically display cyclical patterns of growing population abundance, when significant numbers of caribou may be harvested, but if population growth is not curbed then populations will go into an inevitable decline after the herd exceeds the carrying capacity of its range. These precipitous declines are often followed by extended periods of little or no harvest to allow a herd to recover to a level where sustainable harvest may be allowed. Nelchina caribou herd management is an approach



that has been in place since the mid-1990s with the intent of reducing the extent to which the herd abundance fluctuates, thus allowing harvest annually and avoiding prolonged periods of little or no harvest.

The mild winters and productive summers of 2014, 2015, and 2016 resulted in high productivity within the Nelchina herd and population abundance increased steadily. A significant increase in harvest was necessary to stop population growth and reduce caribou abundance to within population objectives before herd grazing resulted in negative effects on nutritional availability on the herd's range.

Fall abundance estimates are used to predict abundance for the following summer, and the appropriate number of draw permits are issued in February for the following hunting season. The department increased the number of draw permits for RY16, which was the only regulatory option to increase caribou harvest for the Nelchina caribou herd at that time. Public outreach efforts were utilized to encourage harvest; overall harvest (state and federal combined) increased from 4,169 caribou in RY15 to 6,296 caribou in RY16. This was a period of overabundance, and this level of harvest should not be expected annually for Nelchina caribou hunters. Despite this high level of harvest, herd abundance remained well above population objectives after both the fall and winter hunts and remained at its previous level in 2017 (the herd was not reduced). The maximum number of draw permits were issued for RY17 and 4,890 caribou were harvested. Following the fall hunt, Nelchina caribou abundance remained above population objectives by more than 1,400 animals. Given this information, the maximum number of draw permits were issued for RY18.

Over the winter of 2017/2018, adult mortality was higher than predicted and calf recruitment was lower than average. Additionally, in the spring of 2018 the Nelchina herd displayed lower parturition rates than it had in previous years. These factors, including the 2018 calf crop being lower than in recent years, resulted in an abundance estimate for the summer of 2018 that was above the lower end of the population objectives. The reduction in abundance in 2018 was a natural fluctuation that, while not predictable in terms of precise timing, was expected if herd abundance remained above objectives. Had harvest been reduced in RY15, RY16, or RY17, the natural reduction in Nelchina caribou abundance in 2018 may have been much more drastic than observed. The herd has returned to a more manageable size just below or within population objectives, and permit numbers and harvest levels will return to more typical levels. Regardless, the number of draw permits issued in a given year does not affect actual harvest, as draw hunts are regulated with quotas in years such as 2018, when draw permits were issued in February according to the fall abundance estimate, and an accumulation of natural events resulted in a lower than predicted abundance estimate in the following summer.

With the reduction of the herd in 2018, an overall quota of 5% of the herd (1,800 animals) was set to utilize harvestable surplus while still allowing for herd growth. Predicting a federal harvest of 400 animals and a CC001 harvest of 150 bulls, quotas were set for the remaining hunts as: 500 bulls for RC561, 500 bulls for RC562, and 250 bulls for DC485 (Table 1).

The Unit 13 federal caribou season FC1302 opened on August 1, 2018 with no competition from state hunters. CC001 (838 permits) opened on August 10<sup>th</sup> and remained open until September 20<sup>th</sup>. Only 376 CC001 hunters have reported hunting in RY18. RC561 opened on August 10<sup>th</sup> as well, but the quota was achieved, and the hunt was closed by emergency order on August 18<sup>th</sup>. Less than 1,800 RC561 hunters hunted Unit 13 over this time period. DC485 opened on August 20<sup>th</sup>; the quota was met, and the hunt was closed by emergency order on August 26<sup>th</sup>; 1,223 DC485 hunters hunted in Unit 13 over this time period. Only federal hunters and CC001 hunters

were in the field from August 27<sup>th</sup> until September 1<sup>st</sup> when RC562 opened. The quota for RC562 was reached at the close of the regularly scheduled season on September 20<sup>th</sup>; 2,080 RC562 hunters hunted Unit 13 over this time period. Only federal hunters remained in the field from September 21<sup>st</sup> until the fall season closed on September 30<sup>th</sup>. CC001 was the only state hunt to reopen for the winter season on October 21<sup>st</sup> when the federal season also reopened. State hunts, however, were limited to bulls only while the federal hunts remained either sex. Both hunts remained open until March 31<sup>st</sup>. Caribou migrated across federal lands in Unit 13 in late October and early November in 2018. Only 63 caribou were harvested by CC001 hunters during the winter season. A total of 260 caribou were harvested by non-subsistence users in RY18. One-thousand-five-hundred eighty-five caribou were harvested by subsistence users, and 19% of the total harvest of Nelchina caribou was taken on FC1302 permits. The Amount Necessary for Subsistence (ANS) for caribou in Unit 13 is 600–1,000

**Table 1.** Unit 13 caribou hunt structure, RY18.

| Hunt   | Bag Limit   | Permits | Quota | Predicted Harvest | Days Open | Hunted | Actual Harvest |
|--------|-------------|---------|-------|-------------------|-----------|--------|----------------|
| RC561  | Bull Only   | 4,586   | 500   | 500               | 9         | 1,795  | 530            |
| RC562  | Bull Only   | 4,181   | 500   | 500               | 20        | 2,080  | 528            |
| CC001  | Bull Only   | 838     | 400   | 150               | 204       | 376*   | 167            |
| DC485  | Bull Only   | 5,000   | 250   | 250               | 7         | 1,223  | 260            |
| FC1302 | Bull or Cow | 3,082   | -     | 400               | 223       | TBD*   | 360            |
|        |             | 17,687  |       | 1,800             |           | >5,474 | 1,845          |

\*Total number of hunters for RY18 has not been finalized; reports as of 5/21/19

For RY19, Nelchina caribou grouped-up in large photographable aggregations and the herd had very high productivity. The federal caribou season opened August 1<sup>st</sup> and closed on September 30<sup>th</sup>. The new youth caribou hunt (YC495; 200 permits) opened on August 1<sup>st</sup> – closing on August 5<sup>th</sup>. No state hunters were in the field from August 6<sup>th</sup> through the 9<sup>th</sup>. On August 10<sup>th</sup> CC001 opened (810 permits), as well as RC561 (2,790 permits). RC561 closed on August 31<sup>st</sup> and RC562 opened on September 1<sup>st</sup> (2,884 permits). DC485 opened on August 29<sup>th</sup> (399 permits). This hunt structure resulted in significantly less caribou hunters in Unit 13 at any given time, compared to the previous seven seasons. Due to slow harvest rates for both state and federal hunters, additional opportunity for state permits was created for September 21<sup>st</sup> through September 30<sup>th</sup>. This allowed federal hunters holding state permits to continue to hunt on state lands in addition to federal lands during this period. Caribou migrated across the Richardson Highway and largely out of Unit 13 during the season closure of October 1<sup>st</sup> through October 20<sup>th</sup>. Harvestable surplus for RY19 was not harvested during the fall season, and all regularly scheduled caribou seasons reopened on October 21<sup>st</sup> and closed on March 31<sup>st</sup>.

### Moose

Following the standard moose hunt structure for Unit 13, the federal season for RY19 opened on August 1<sup>st</sup> and closed on September 20<sup>th</sup>. No other moose hunters were in the field from August 1<sup>st</sup> until CM300 opened on August 20<sup>th</sup>. There were 2,140 CM300 permits for RY19, but in RY18 only 662 CM300 hunters actually hunted out of 2,331 permits issued. On September 1<sup>st</sup> the state general moose season opened, as did DM324 (5 permits) and DM335–DM339 (115 permits combined). All moose hunts closed on September 20<sup>th</sup>.



### Management Strategies

The Amount Necessary for Subsistence (ANS) for caribou in Unit 13 is 600–1,000 and the ANS for moose in Unit 13 is 300–600. Harvestable surplus and harvest for both caribou and moose in Unit 13 were well above the ANS in RY18 with 1,845 caribou and at least 790 moose harvested. Total moose harvest for RY18 in Unit 13 has not been finalized, as harvest data continues to be coded for GM000. Federal permit holders harvesting caribou in Unit 13 where caribou are available on federal subsistence hunt areas annually harvest 7%–19% of the total Nelchina caribou harvest (most recent five-year average = 11%). Federal permit holders harvesting moose on federal lands in Unit 13 account for 8%–10% of the total moose harvest in Unit 13 (most recent five-year average = 9%).

Federal hunt data does not support the interpretation that the number of state hunters in the field negatively impacts either moose or caribou hunt success on federal permits in Unit 13. In RY10–RY13 the average number of annual state moose hunters in Unit 13 was 4,602 (Table 2). This average increased to 5,190 state moose hunters for RY14–RY17. Federal permit success during those time periods actually increased from a four-year average of 5% to a four-year average of 7%; federal hunt success increased from a four-year average of 10% to 13%; federal catch per unit effort (CPUE 100dy) also increased from a four-year average of 1.53 moose per 100 days of effort to a four-year average of 2.15 moose per 100 days of effort. In RY18 the number of state moose hunters in Unit 13 dropped to 4,553, but federal moose permit success also dropped to 4%, federal hunt success dropped to 10%, and federal CPUE dropped to 1.7 moose per 100 days.

Table 2. Unit 13 Federal Moose Harvest and State Moose Hunter Numbers

| RY   | FM1301<br>Harvest | FM1301<br>Permits | FM1301<br>Hunted | Permit<br>Success | Hunt<br>Success | State<br>Hunters | Total<br>Unit 13<br>Harvest | % Harvest<br>on FM1301<br>Permits | FM1301<br>CPUE<br>(100dy) |
|------|-------------------|-------------------|------------------|-------------------|-----------------|------------------|-----------------------------|-----------------------------------|---------------------------|
| 2010 | 77                | 1,172             | 669              | 7%                | 12%             | 4,239            | 777                         | 10%                               | 1.4                       |
| 2011 | 80                | 1,327             | 680              | 6%                | 12%             | 4,156            | 826                         | 10%                               | 1.8                       |
| 2012 | 59                | 1,292             | 645              | 5%                | 9%              | 4,896            | 625                         | 9%                                | 1.4                       |
| 2013 | 50                | 1,205             | 535              | 4%                | 9%              | 5,116            | 624                         | 8%                                | 1.5                       |
| 2014 | 86                | 1,313             | 656              | 7%                | 13%             | 4,649            | 845                         | 10%                               | 2.1                       |
| 2015 | 85                | 1,330             | 699              | 6%                | 12%             | 5,039            | 966                         | 9%                                | 2                         |
| 2016 | 99                | 1,385             | 685              | 7%                | 14%             | 5,866            | 983                         | 10%                               | 2.3                       |
| 2017 | 90                | 1,399             | 686              | 6%                | 13%             | 5,208            | 905                         | 10%                               | 2.2                       |
| 2018 | 61                | 1,357             | 631              | 4%                | 10%             | 4,553*           | 790*                        | 8%                                | 1.7                       |

\*Total number of GM000 hunters and harvest for RY18 in Unit 13 has not been finalized; reports as of 5/21/2019

Similarly, for RY10–RY13 the four-year average for number of state caribou hunters in Unit 13 was 4,849 (Table 3). This four-year average increased to 7,214 state caribou hunters for RY14–RY17. Permit success during those time periods remained stable with four-year averages of 14% for both time periods; hunt success remained stable with four-year averages of 28% for both time periods; catch per unit effort (CPUE 100dy) decreased slightly from a four-year average of 4.80 caribou per 100 days of effort to a four-year average of 4.62 caribou per 100 days of effort. In RY18 the total number of state caribou hunters dropped to roughly 5,474 hunters; while federal reporting is not complete at this time to provide hunt success or CPUE for RY18, the overall permit success actually dropped to 11% with the decrease of state hunters in the field. Federal hunt success for caribou is likely impacted more by the timing of caribou migration across federal lands than by the number of state hunters in the field.

Table 3. Unit 13 Federal Caribou Harvest and State Caribou Hunter Numbers

| FC1302 |              |              |             |              |               |         |                |                |              |      |               |               |
|--------|--------------|--------------|-------------|--------------|---------------|---------|----------------|----------------|--------------|------|---------------|---------------|
| RY     | Bull Harvest | % of Harvest | Cow Harvest | % of Harvest | Total Harvest | Permits | Permit Success | Permits Hunted | Hunt Success | CPUE | State Permits | State Hunters |
| 2010   | 316          | 70%          | 130         | 29%          | 452           | 2,852   | 16%            | 1,536          | 29%          | 5.1  | 4,755         | 3,279         |
| 2011   | 281          | 71%          | 113         | 29%          | 395           | 2,980   | 13%            | 1,425          | 28%          | 4.8  | 4,598         | 3,260         |
| 2012   | 326          | 61%          | 203         | 38%          | 537           | 2,953   | 18%            | 1,518          | 35%          | 6    | 8,449         | 6,198         |
| 2013   | 210          | 75%          | 68          | 24%          | 279           | 2,781   | 10%            | 1,305          | 21%          | 3.3  | 12,567        | 6,654         |
| 2014   | 177          | 75%          | 59          | 25%          | 237           | 2,943   | 8%             | 1,395          | 17%          | 2.6  | 7,164         | 4,718         |
| 2015   | 444          | 75%          | 147         | 25%          | 595           | 3,064   | 19%            | 1,562          | 38%          | 6.9  | 8,895         | 5,735         |
| 2016   | 299          | 61%          | 192         | 39%          | 491           | 3,158   | 16%            | 1,532          | 32%          | 5.4  | 14,475        | 9,649         |
| 2017   | 207          | 58%          | 145         | 41%          | 354           | 3,071   | 12%            | 1,517          | 23%          | 3.6  | 14,446        | 8,754         |
| 2018   | 220          | 63%          | 129         | 37%          | 352           | 3,082   | 11%            | -              | -            | -    | 14,605        | 5,474         |
| 2019   | -            | -            | -           | -            | -             | -       | -              | -              | -            | -    | 7,083         | -             |

Federally qualified subsistence hunters wishing to harvest moose and caribou in Unit 13 can and do participate in subsistence and general season hunts for moose or caribou offered by the State of Alaska, which allow these hunters to access wildlife resources on all public lands in Unit 13. Federally qualified subsistence caribou hunters in Unit 13 may choose to hunt state lands in addition to federal lands by participating in Tier I registration hunts (RC561 or RC562) or the Community Subsistence Harvest opportunity (CC001). Federally qualified subsistence moose hunters in Unit 13 may choose to hunt state lands in addition to federal lands by participating in the general season moose hunt (GM000) or the Community Subsistence Harvest opportunity (CM300).

While no hunting-related accidents have been reported in Unit 13 to substantiate a public safety concern related to excessive hunting pressure on Unit 13 federal lands at large, questionable hunting practices do create a public safety concern when caribou are migrating across the Richardson Highway in late fall or early winter. This public safety concern is most often a result of traffic jams caused by hunters walking on and/or parking on the pavement of the Richardson Highway in narrow and dangerous sections of the road in an attempt to harvest caribou that have just been witnessed crossing the road. This situation occurs every year when caribou cross during open hunting seasons, even during times when state hunts are closed and only federal hunters have the opportunity to harvest animals during the migration across the highway. This public safety concern is a realistic argument presented in WSA19-03, but this concern would not be addressed by eliminating state hunters from hunting on federal lands. If this public safety concern is to be addressed, the most effective way to do so would be to consider a corridor along the Richardson Highway in which all hunting is prohibited within a given distance from the centerline of the highway.

### Position

Harvestable surplus and harvest levels for both moose and caribou in Units 12 & 13 are well above ANS. The Nelchina caribou herd in RY19 returned to an overabundance that necessitated increased harvest. Surveys will be conducted in June and July 2020 to ascertain current productivity and abundance for the Nelchina caribou herd. There is no conservation concern at this time. WSA20-01 seeks to open the caribou season during the rut, a time when many consider the meat of bull caribou to be unpalatable. ADF&G is Opposed on that aspect of the proposal. Most caribou herds in Alaska are



Anthony Christianson

~ 6 ~

May 20, 2020

managed with a break during the rut to allow time for uninterrupted breeding and to discourage the potential take of unpalatable meat. The proposal also seeks to change the bag limit from 2 caribou, sex to be announced by the federal manager to just two caribou. ADF&G sees no justification for diminishing the manager's discretion in this way, but annual bag limits and in-season changes should be set in consultation with state wildlife managers.

WSA20-02 seeks to establish a community harvest system for moose and caribou similar to the action taken by the Federal Subsistence Board under WP18-19. ADF&G does not take a position on administration procedures for federal hunts.

WSA20-03 seeks to close federal public lands to moose and caribou hunting except for federally qualified users. There is no evidence that hunting pressure has displaced moose or caribou from traditional migration corridors. The data indicate that restricting federal lands to federally qualified hunters is not likely to impact hunt success for federally qualified hunters. The action proposed in WSA20-03 action will not address the perceived public safety concern on federal lands during the caribou hunting season particularly along the Richardson Hwy.

Cc: Eddie Grasser, Director, Division of Wildlife Conservation  
 Lisa Olson, Operations Manager, Subsistence Section  
 Cheryl Brooking, Assistant Attorney General, Department of Law  
 George Pappas, State Liaison, Office of Subsistence Management





# Federal Subsistence Board News Release



U.S. Fish and Wildlife Service  
Bureau of Land Management  
National Park Service  
Bureau of Indian Affairs

Forest Service

**For Immediate Release:**  
July 31, 2020

**Contact:** Lisa Maas  
(907) 786-3357 or (800) 478-1456  
[lisa\\_maas@fws.gov](mailto:lisa_maas@fws.gov)

## **Changes in Federal Moose and Caribou Hunting Regulations in Unit 13** Frequently asked questions on closure of Federal public lands to non-Federally qualified users.

On July 16, 2020, the Federal Subsistence Board (Board) adopted Temporary Wildlife Special Action WSA20-03 with modification to close the Federal public lands that are open to Federal subsistence hunting in Units 13A and 13B to moose and caribou hunting by non-Federally qualified users for the 2020-2021 and 2021-2022 seasons. This factsheet answers common questions and concerns about the closure.

### **1. Exactly where does the Federal closure apply?**

The closure only applies to the Federal public lands in Units 13A and 13B that are open to Federal subsistence hunting. This includes the Federal subsistence hunt areas along the Richardson highway near Paxson and the Delta and Gulkana river corridors that are managed by the Bureau of Land Management (BLM). The yellow/shaded areas in the map at the end of this factsheet depict the BLM lands in Units 13A and 13B open to Federal subsistence hunting, which now comprise the “closure area.” A more detailed map of the closed areas can be found at this link:

<https://www.blm.gov/documents/alaska/public-room/map/state-moose-and-caribou-hunt-restricted-areas-gmul3-and-b-2020-2022>

### **2. What activities are prohibited within the closure area?**

Non-Federally qualified users (State hunters) may not hunt or harvest moose or caribou within the closure area. However, non-Federally qualified users, hunting under State regulations, may still travel through, camp, and hunt/trap for other species on Federal public lands within the closure area. The closure area also remains open to all other activities such as hiking, boating, wildlife viewing, etc.

### **3. Who is eligible to hunt moose and caribou on Federal public lands in Unit 13?**

As of July 16, 2020, ONLY “Federally qualified subsistence users” are eligible to hunt moose and caribou on Federal public lands in the closure area. “Federally qualified subsistence users” are rural residents who have been determined by the Federal Subsistence Board to have customary and traditional use of moose and caribou in Unit 13. For customary and traditional use determinations see 50 CFR 100.24 or the Federal subsistence regulations book at:

[https://www.doi.gov/sites/doi.gov/files/uploads/2018-20\\_wildlife\\_regs\\_book\\_final\\_web\\_3.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/2018-20_wildlife_regs_book_final_web_3.pdf)

### **4. How long will this closure be in effect?**

The closure is effective for the 2020-2021 and 2021-2022 seasons, which extend from July 1, 2020 through June 30, 2022.

**5. Can a non-Federally qualified user take moose and caribou on gravel bars along navigable waters below the “ordinary high water mark” when the adjacent uplands are Federal public lands?**

When the adjacent uplands are Federal public lands, the strip of land—often a gravel or mud bar—between the edge of a river and the “ordinary high water mark” is open in some areas to moose and caribou hunting by non-Federally qualified users. For the Unit 13 closure area, non-Federally qualified users are allowed to take moose and caribou between the edge of the river and the ordinary high water mark along navigable waters on BLM lands, including the Delta and Gulkana Rivers.

PLEASE NOTE: While non-Federally qualified users are allowed to take moose and caribou between the edge of a river and the ordinary high water mark, both the hunter AND the caribou must be *above* the actual water line but *below* the ordinary high water mark for the harvest to be legal. **Hunters are strongly urged to use caution and extremely good judgment if hunting in this narrow strip of land to avoid the risk of violating the law.**

**6. How is “ordinary high water mark” defined?**

The ordinary high water mark means “that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas” (33 CFR 328.3).

**7. Can a Federally qualified subsistence user hunt in the closure area with only a State registration permit?**

No, Federal registration permits are required to hunt moose (FM1301) and caribou (FC1302) under Federal subsistence regulations in Unit 13. The closure area is closed to all moose and caribou hunting under State regulations.

**8. Why did the Board enact this closure?**

Similar to Emergency Orders issued by the Alaska Department of Fish and Game, the Federal Subsistence Management Program can make in-season, out-of-cycle, temporary regulation changes through the Special Action process. An individual submitted special action request asking the Board to close Federal public lands in Unit 13 to the hunting of moose and caribou by non-Federally qualified users for the 2020/21 season. The Board acted on the request at a public meeting held by teleconference July 16, 2020. The Board approved a closure in Units 13A and 13B only, for the 2020-2022 seasons due to necessity for reasons of public safety and continuation of subsistence uses. The Board limited the closure Units 13A and 13B because this is the area where most overcrowding, disruption of hunts, and serious safety concerns have occurred.

**9. Who should I contact if I have further questions about this closure?**

Please contact the Office of Subsistence Management at (907) 786-3888, (800) 478-1456 or [Subsistence@fws.gov](mailto:Subsistence@fws.gov). You can also contact the BLM Glennallen Field Office at (907) 822-3217.

Additional information on the Federal Subsistence Management Program may be found on the web at [www.doi.gov/subsistence](http://www.doi.gov/subsistence) or by visiting [www.facebook.com/subsistencealaska](https://www.facebook.com/subsistencealaska).

**Missing out on the latest Federal subsistence issues?** If you’d like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing [fws-fsb-subsistence-request@lists.fws.gov](mailto:fws-fsb-subsistence-request@lists.fws.gov).

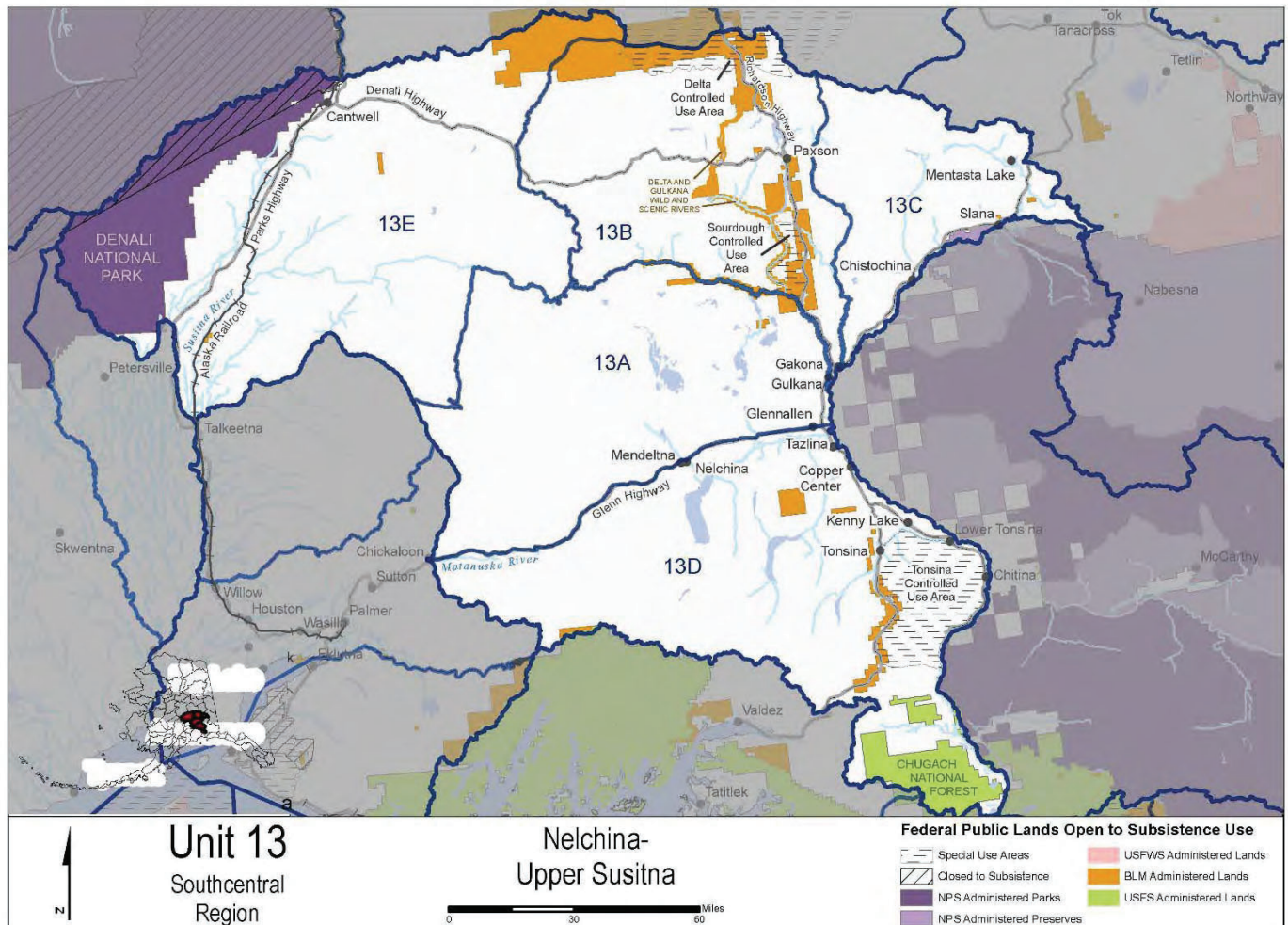


# Federal Subsistence Board News Release



U.S. Fish and Wildlife Service  
Bureau of Land Management  
National Park Service  
Bureau of Indian Affairs

Forest Service



###-

**FW: [EXTERNAL] WSA20-03 GMU -13**

AK Subsistence, FW7 <subsistence@fws.gov>

Tue 7/28/2020 11:51 AM

**From:** aaron bloomquist <bloomya@hotmail.com>

**Sent:** Saturday, July 25, 2020 10:14 AM

**To:** adf&g commissioner <dfg.commissioner@alaska.gov>; doug.vincent-lang@alaska.gov

**Cc:** Herb Mansavage <teamshadowridge@gmail.com>; Rick.green@alaska.gov; Eddie K Grasser, (DFG) <eddie.grasser@alaska.gov>; AK Subsistence, FW7 <subsistence@fws.gov>; Perry, DeAnna L -FS <dlperry@fs.fed.us>

**Subject:** [EXTERNAL] WSA20-03 GMU -13

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Dear Commissioner,

I urge you to entirely close the Moose and Caribou Seasons on Federal Lands in GMU's 13A and 13B.

WSA20-03 has overstepped the bounds of anything ANILCA and the FSB system was ever intended to accomplish. These Special Action Requests and overly restrictive actions by the FSB have reached the point of ridiculousness.

I have hunted this area both as a Federal Subsistence user and under general season harvest, mostly for caribou. It is well know that there has been moderate crowding for many decades but the area holds an abundance of game. The Nelchina herd has recently been above objectives and anyone that takes a little time can get caribou in this area. This is one of the easiest areas to get a caribou I have ever hunted. Access is great and the season extremely long for the Federal hunters. Much of the area is fairly poor moose habitat but moose populations are healthy.

At this point in history it seems to me this abundant resource will be harvested inequitably on these Federal lands with no justification other than the proponent does not want to see other hunters. I know the proponent. He owned a lodge in the area for decades, has an airplane and numerous cabins. I also know dozens of locals in the area that get their caribou, with just a little effort, mostly from the road, every year and take moose at a reasonable sucess rate.



Due to the fact that this overreach has caused such an inequitable situation, I believe you should use your Emergency Order Authority to close the seasons entirely. This is justifiable because State Law requires harvest of trust property equally among residents except in times of shortage. This is far from a time of shortage. Your mandate may conflict with the FSB mandate but you should use your mandates as your guidance in this situation. This will bring the FSB back to the table. There are literally thousand of Alskans that have been using this resource for many decades that have been harmed by this decision.

My intent is not to keep the area closed unless the FSB does not re-consider this decision. My intent is to illustrate the extreme precedent that has been with an equally extreme response.

My opinion may be different if there was a shortage or a conservation concern but there is not. I serve on the Southcentral RAC and the Mat-Su AC, but we did not take up this WSA. I also thought it was poorly noticed in the time of COVID and missed the public comment period. By the time I saw it, there was only time for tribal and corporation comment.

Thanks,

Aaron Bloomquist  
907-982-2471

## Mckinney, Kayla T

---

**From:** Detwiler, Sue K  
**Sent:** Tuesday, June 9, 2020 11:26 AM  
**To:** Leonetti, Crystal  
**Subject:** FW: [EXTERNAL] FW: Alaska - No reported food shortage or supply chain disruptions

---

**From:** Namitz, Steven M -FS <[steven.namitz@usda.gov](mailto:steven.namitz@usda.gov)>  
**Sent:** Tuesday, June 9, 2020 8:29 AM  
**To:** Detwiler, Sue K <[sue\\_detwiler@fws.gov](mailto:sue_detwiler@fws.gov)>; Doolittle, Thomas C <[thomas\\_doolittle@fws.gov](mailto:thomas_doolittle@fws.gov)>; Lord, Kenneth M <[Ken.Lord@sol.doi.gov](mailto:Ken.Lord@sol.doi.gov)>  
**Subject:** [EXTERNAL] FW: Alaska - No reported food shortage or supply chain disruptions

Just an FYI for today's conversation.



**Steve Namitz**  
**District Ranger**  
**Forest Service**  
**Chugach National Forest; Cordova Ranger District**

p: 907-424-4747  
[steven.namitz@usda.gov](mailto:steven.namitz@usda.gov)  
612 2nd Street (P.O. Box 280)  
Cordova, AK 99574  
[www.fs.fed.us](http://www.fs.fed.us)



**Caring for the land and serving people**

---

**From:** Roberts, Mark W (MVA) [<mailto:mark.roberts@alaska.gov>]  
**Sent:** Friday, June 5, 2020 12:12 PM  
**To:** Namitz, Steven M -FS <[steven.namitz@usda.gov](mailto:steven.namitz@usda.gov)>; Cross, Robert - FS <[robert.cross@usda.gov](mailto:robert.cross@usda.gov)>; Sandhofer, Ted -FS <[ted.sandhofer@usda.gov](mailto:ted.sandhofer@usda.gov)>  
**Subject:** Alaska - No reported food shortage or supply chain disruptions

Steven and Robert and Ted:

We are unaware of any food shortages or supply chain significant food supply chain disruptions as a result of COVID-19.

You can contact me if you have any questions,

Mark W Roberts  
Alaska SEOC Operations Section Chief  
2020 COVID-19 Response  
[2020\\_COVID-19@ak-prepared.com](mailto:2020_COVID-19@ak-prepared.com)  
SEOC: 907-428-7100

Alaska State Emergency Operations Center Manager  
Alaska Division of Homeland Security and Emergency Management  
Direct (907) 428-7016 Email: [mark.roberts@alaska.gov](mailto:mark.roberts@alaska.gov) Web: <http://www.ready.alaska.gov>  
SEOC (907) 428-7100 [seoc@ak-prepared.com](mailto:seoc@ak-prepared.com)  
Toll Free: (800) 478-2337  
P.O. Box 5750  
JBER, AK 99505-5750

**From:** Cross, Robert - FS <[robert.cross@usda.gov](mailto:robert.cross@usda.gov)>  
**Sent:** Thursday, June 4, 2020 4:35 PM  
**To:** Fisher, Bryan J (MVA) <[b.fisher@alaska.gov](mailto:b.fisher@alaska.gov)>  
**Cc:** Sandhofer, Ted -FS <[ted.sandhofer@usda.gov](mailto:ted.sandhofer@usda.gov)>; Suminski, Terry -FS <[terry.suminski@usda.gov](mailto:terry.suminski@usda.gov)>  
**Subject:** Federal Special Action for Subsistence Harvest in Kake

Bryan,

The Petersburg District Ranger and in-season manager, Ted Sandhofer, under delegation of authority from the Federal Subsistence Board, is responding to a request from the Organized Village of Kake to provide Federal harvest opportunities of moose and deer for reasons of public safety and food security during the COVID-19 pandemic. The request is being reviewed with consultation from the Department of Fish and Game, the Office of Subsistence Management, and the Organized Village of Kake. The proponent is requesting 2 moose and 5 deer per month for a 60 day period to assist the community with food security issues related to COVID-19. Please contact myself or [Ted Sandhofer](#) to discuss the request in further detail.

Thanks,



**Robert Cross**  
**Zone Fish & Wildlife Biologist**  
**Forest Service**  
**Tongass National Forest,**  
**Petersburg and Wrangell Ranger District**

p: 907-772-5944  
c: 907-723-8653  
f: 907-772-5995  
[robert.cross@usda.gov](mailto:robert.cross@usda.gov)

12 N. Nordic Drive  
PO Box 1328  
Petersburg, AK 99833  
[www.fs.fed.us](http://www.fs.fed.us)



**From:** "Namitz, Steven M -FS" <[steven.namitz@usda.gov](mailto:steven.namitz@usda.gov)>  
**Date:** June 5, 2020 at 10:47:21 AM AKDT  
**To:** "Fisher, Bryan J (MVA)" <[b.fisher@alaska.gov](mailto:b.fisher@alaska.gov)>  
**Cc:** "Namitz, Steven M -FS" <[steven.namitz@usda.gov](mailto:steven.namitz@usda.gov)>  
**Subject:** Meeting to discuss food security within Cordova and Prince William Sound

Bryan,



I have been designated as the in season manager for a Federal Subsistence special action related to food security in Cordova and Prince William Sound. You have been identified by the as the point of contact for the State of Alaska Unified Command Mass Care Group. I would like to set up a consultation meeting to discuss our current situation.

Looking forward to a discussion,  
Steve



**Steve Namitz**  
**District Ranger**  
**Forest Service**  
**Chugach National Forest; Cordova Ranger District**

p: 907-424-4747

[steven.namitz@usda.gov](mailto:steven.namitz@usda.gov)

612 2nd Street (P.O. Box 280)  
Cordova, AK 99574

[www.fs.fed.us](http://www.fs.fed.us)



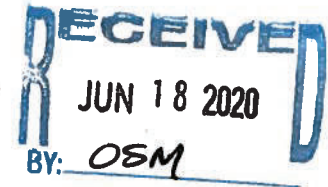
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File Code: 6220  
Date: June 12, 2020

Anthony Christiansen  
Federal Subsistence Board Chairman  
Department of Interior  
Office of Subsistence Management  
1011 East Tudor Road  
MS 121  
Anchorage, AK 99503-6199



Dear Chairman Christiansen:

On April 13, 2020, the Federal Subsistence Board (Board) received Special Action request WSA19-14 from the Organized Village of Kake (OVK) to provide Federal harvest opportunities of moose and deer outside the regular seasons for reasons of public safety and food security during the COVID-19 pandemic. In response to OVK's request, the Board issued a letter of delegated authority to me, the USDA Forest Service, Petersburg District Ranger on June 2, 2020, which granted specific authority to respond to requests for the taking of deer and moose for reasons of public safety and food security during the COVID-19 pandemic.

Subsequently, on June 4, 2020, I received a letter from the OVK requesting the harvest of 2 moose and 5 deer per month for a 60-day period. My letter of delegation requires, among other things, consultation with the Alaska Department of Fish and Game (ADF&G) and the State of Alaska Unified Command Mass Care Group (Mass Care Group). Concurrence with the proposed action was requested of ADF&G on June 4, 2020. To date, I have not received an official response.

My letter of delegated authority for this purpose stipulates that consultation with the Mass Care Group must occur prior to implementing any emergency special action. I contacted the Mass Care Group on June 4, 2020 and was informed by Mark W. Roberts, Alaska SEOC Operations Section Chief, that the State was "unaware of any food shortages" in Kake. After further consultation between members of the Mass Care Group and me, they could not confirm any food shortage or supply chain disruption in Kake.

My letter of delegation states that without confirmation of a food shortage by the State of Alaska Unified Command Mass Care Group, I must defer the special action to the Board. Therefore, with this letter I am deferring this special action request to the Board.

Sincerely,

TED SANDHOFER  
District Ranger

cc: Earl Stewart, Wayne Owen



**Mckinney, Kayla T**

---

**From:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Sent:** Tuesday, July 7, 2020 2:37 PM  
**To:** Maas, Lisa; Detwiler, Sue K  
**Subject:** Fw: [EXTERNAL] Emergency Season Harvest Data

I have no idea where George got the impression we couldn't provide *any* information to the State. His email is probably what caused the State to blow a gasket...

*Theo Matuskowitz  
 Supervisory Regulations Specialist  
 US Fish and Wildlife Service  
 Office of Subsistence Management  
 1011 East Tudor Road, MS 121  
 Anchorage, AK 99503-6199  
 Office: (907) 786-3867  
 Telework: (907) 357-3095  
 FAX (907) 786-3898  
 theo\_matuskowitz@fws.gov*

---

**From:** Maas, Lisa <Lisa\_Maas@fws.gov>  
**Sent:** Tuesday, July 7, 2020 2:14 PM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; Detwiler, Sue K <sue\_detwiler@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Pappas, George E <george\_pappas@fws.gov>; Lord, Kenneth M <Ken.Lord@sol.doi.gov>  
**Subject:** Re: [EXTERNAL] Emergency Season Harvest Data

Thanks, Theo.

Sounds like this needs to be clarified from OSM to ADF&G and the USFS . . .

~~~~~  
 Lisa Maas
 Acting Policy Coordinator/Wildlife Biologist
 Office of Subsistence Management
 U.S. Fish and Wildlife Service
 Anchorage, AK
 907-786-3357

From: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Sent: Tuesday, July 7, 2020 2:12 PM
To: Maas, Lisa <Lisa_Maas@fws.gov>; Detwiler, Sue K <sue_detwiler@fws.gov>; Doolittle, Thomas C <thomas_doolittle@fws.gov>; Pappas, George E <george_pappas@fws.gov>; Lord, Kenneth M <Ken.Lord@sol.doi.gov>
Subject: Re: [EXTERNAL] Emergency Season Harvest Data

All,

See below, in their request, I've noted what we have OMB approval to collect and what we don't have permission to collect. Ken and I never stated that we couldn't honor any of the state's request. Just a few items, and of course, the PII.

*Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
Office: (907) 786-3867
Telework: (907) 357-3095
FAX (907) 786-3898
theo_matuskowitz@fws.gov*

From: Maas, Lisa <Lisa_Maas@fws.gov>
Sent: Tuesday, July 7, 2020 2:04 PM
To: Detwiler, Sue K <sue_detwiler@fws.gov>; Doolittle, Thomas C <thomas_doolittle@fws.gov>; Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; Pappas, George E <george_pappas@fws.gov>; Lord, Kenneth M <Ken.Lord@sol.doi.gov>
Subject: Fw: [EXTERNAL] Emergency Season Harvest Data

See George's response to the State below.

~~~~~  
Lisa Maas  
Acting Policy Coordinator/Wildlife Biologist  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
907-786-3357

---

**From:** Pappas, George E <george\_pappas@fws.gov>  
**Sent:** Tuesday, June 30, 2020 10:08 AM  
**To:** Scott, Ryan (DFG) <ryan.scott@alaska.gov>; Stewart, Earl -FS <estewart@fs.fed.us>; Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>; mark.burch <mark.burch@alaska.gov>  
**Cc:** Schumacher, Tom V (DFG) <tom.schumacher@alaska.gov>; Robbins, Frank F (DFG) <frank.robbs@alaska.gov>; Maas, Lisa <Lisa\_Maas@fws.gov>; Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Detwiler, Sue K <sue\_detwiler@fws.gov>  
**Subject:** Re: [EXTERNAL] Emergency Season Harvest Data

Director Scott,

I have been informed the information being requested cannot be collected and shared due to the rules set forth by the Privacy Act.

Please contact me with any questions.  
Thank you,

-GP-

---

**From:** Scott, Ryan (DFG) <ryan.scott@alaska.gov>

**Sent:** Friday, June 26, 2020 1:07 PM

**To:** Stewart, Earl -FS <estewart@fs.fed.us>

**Cc:** Schumacher, Tom V (DFG) <tom.schumacher@alaska.gov>; Pappas, George E <george\_pappas@fws.gov>; Robbins, Frank F (DFG) <frank.robbins@alaska.gov>

**Subject:** [EXTERNAL] Emergency Season Harvest Data

Earl,

In anticipation of the emergency moose and deer harvests in Game Management Unit 3 recently authorized by the Federal Subsistence Board, the Alaska Department of Fish and Game (Department) requests the following information from each harvested animal:

- Species **YES**
- Name of successful hunter **NO, although Ken did supply a possible solution worked out by previous ARD, Pete Probasco.**
- Date and location of harvest (GPS or written description) **YES**
- Lower jaw (moose only) **NO**
- Photos of antlers (moose only) **NO**
- Transportation used **YES**
- How many days hunted **YES**
- Number of other moose seen (cows, calves, and bulls) **NO**
- Number of brow tines on the left and right moose antlers, total number of points and antler width at the widest point. spread. **Antler width YES; NO to the brow tines and antler points.**

These are standard data collected for moose and deer harvested during established seasons. Deer and moose are highly sought-after species by all Unit 3 hunters, and dense forest makes collecting population-level information on both species difficult. As such, the Department relies on harvest data to inform management decisions; all harvest, regardless of how it is authorized, is important to incorporate into management decisions.

Thanks for your help with this. Please contact me at (907) 465-4190, reply email, or 209-7114 if there are any questions, and if I can be of further assistance.

Ryan

**Mckinney, Kayla T**

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**From:** James Brooks <jbrooks@adn.com>  
**Sent:** Thursday, June 25, 2020 10:14 AM  
**To:** Maas, Lisa  
**Subject:** Re: [EXTERNAL] Re: Subsistence: News Release: Federal Subsistence Board takes action on Emergency Fisheries and Wildlife Special Action Requests FSA20-04 (Copper River salmon), FSA20-05 (Kuskokwim River salmon) and WSA19-14 (Unit 3 moose and deer)

Ah, gotcha -- after reading Kake's petition, I was wondering what kind of impact the cutbacks in ferry service were having, too.

On Thu, Jun 25, 2020 at 9:44 AM Maas, Lisa <[Lisa\\_Maas@fws.gov](mailto:Lisa_Maas@fws.gov)> wrote:

Hi James,

Yes, receiving 11 requests within a month or so is a lot, but the uncertainty caused by the ongoing public health concerns is unprecedented. A typical special action request for OSM to receive is a request for a season extension because of a localized weather event that prevented users from accessing resources during the normal season; OR a new survey comes in that demonstrates a substantial decline in a wildlife population and conservation measures are immediately necessary.

Lisa

~~~~~  
 Lisa Maas
 Acting Policy Coordinator/Wildlife Biologist
 Office of Subsistence Management
 U.S. Fish and Wildlife Service
 Anchorage, AK
 907-786-3357

From: James Brooks <jbrooks@adn.com>
Sent: Thursday, June 25, 2020 9:26 AM
To: Maas, Lisa <Lisa_Maas@fws.gov>
Subject: Re: [EXTERNAL] Re: Subsistence: News Release: Federal Subsistence Board takes action on Emergency Fisheries and Wildlife Special Action Requests FSA20-04 (Copper River salmon), FSA20-05 (Kuskokwim River salmon) and WSA19-14 (Unit 3 moose and deer)

Thanks! Is that an abnormally large number?

On Thu, Jun 25, 2020 at 7:36 AM Maas, Lisa <Lisa_Maas@fws.gov> wrote:

Hi James,

The Office of Subsistence Management has received 11 special action requests since March related to food security. See attached table.

thanks,

Lisa

~~~~~

Lisa Maas  
Acting Policy Coordinator/Wildlife Biologist  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
907-786-3357

---

**From:** James Brooks <[jbrooks@adn.com](mailto:jbrooks@adn.com)>  
**Sent:** Wednesday, June 24, 2020 8:17 PM  
**To:** Maas, Lisa <[Lisa\\_Maas@fws.gov](mailto:Lisa_Maas@fws.gov)>  
**Subject:** [EXTERNAL] Re: Subsistence: News Release: Federal Subsistence Board takes action on Emergency Fisheries and Wildlife Special Action Requests FSA20-04 (Copper River salmon), FSA20-05 (Kuskokwim River salmon) and WSA19-14 (Unit 3 moose and deer)

Lisa, it's James Brooks over at the Anchorage Daily News. I just read over the Kake decision ... how extraordinary is that kind of thing? It seems pretty amazing to me that they'd be worried enough about their food supply to request an emergency order, but that might be a common thing -- I just don't know.

On Wed, Jun 24, 2020 at 5:00 PM 'Federal Subsistence News' via NewsTips <[newstips@adn.com](mailto:newstips@adn.com)> wrote:

\*\*\*\*\*

Federal Subsistence Board listserver

This list is for subscription only. You cannot reply to a message. You can view the news release archive or issues of importance in Subsistence at: <http://www.doi.gov/subsistence/index.cfm>

For further information about a news release or event, call the phone number or email the contact listed in the news release.

\*\*\*\*\*

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**James Brooks**

State Reporter  
[jbrooks@adn.com](mailto:jbrooks@adn.com) | cell: 907-419-7732

**Anchorage Daily News** | [adn.com](http://adn.com)  
300 W. 31st Ave.  
Anchorage, AK 99503



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**James Brooks**

0460-FSB

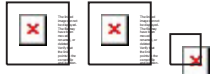
State Reporter

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300 W. 31st Ave.

Anchorage, AK 99503





## Federal Subsistence Board Meeting Advisory



**For Immediate Release:**  
March 18, 2020

**Contact:** Caron McKee  
(907) 786-3880 or (800) 478-1456  
caron\_mckee@fws.gov

### **Federal Subsistence Board to hold teleconference to consider proposals to change Federal subsistence hunting and trapping regulations**

**PUBLIC NOTICE** - The Federal Subsistence Board (Board) will meet via teleconference only, April 20-23, 2020, to consider proposed changes to Federal subsistence hunting and trapping regulations for the 2020-2022 regulatory years, and to discuss other subsistence related topics. The regulatory proposals may be viewed at [www.doi.gov/subsistence/proposal/current](http://www.doi.gov/subsistence/proposal/current).

The Federal Subsistence Board encourages the public to participate by teleconference. Throughout the meeting, there will be opportunities for the public to testify on both agenda and non-agenda items. At the start of each day, public comments on general subsistence issues will be welcomed. The public will be provided the opportunity to comment on specific hunting and trapping proposals while each proposal is considered by the Board.

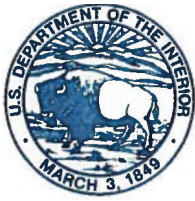
To participate in this meeting by teleconference, dial toll-free (888) 566-1030 (passcode 3344290). The full agenda and any available meeting materials will be posted to the Federal Subsistence Management Program's website at [www.doi.gov/subsistence/board](http://www.doi.gov/subsistence/board).

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct requests for sign language interpreting services, closed captioning, or other accommodation needs to the Office of Subsistence Management at (800) 478-1456 / (907) 786-3888 or by e-mail at [subsistence@fws.gov](mailto:subsistence@fws.gov) at least seven business days prior to the meeting.

Additional information on the Federal Subsistence Management Program may be found on the web at [www.doi.gov/subsistence](http://www.doi.gov/subsistence) or by visiting [www.facebook.com/subsistencealaska](https://www.facebook.com/subsistencealaska).

**Missing out on the latest Federal subsistence issues?** If you'd like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing [fws-fsb-subsistence-request@lists.fws.gov](mailto:fws-fsb-subsistence-request@lists.fws.gov).

-###-



## United States Department of the Interior


Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:  
OSM 20022.SD

### Memorandum

To: David Bernhardt, Secretary

Through: Stephen Wackowski, Senior Advisor for Alaska Affairs

From: Susan Detwiler, Assistant Regional Director, Office of Subsistence Management 

Subject: Federal Subsistence Board Delegation of Authority for Pandemic-related Emergency Special Actions.

### Summary:

The Federal Subsistence Board (Board) has received several requests from remote Alaska communities asking the Board for emergency openings of federal subsistence hunting seasons to address food shortages associated with the COVID-19 pandemic. The requesters indicate that pandemic-related reductions in travel, reductions in transportation of goods to their communities, and disruptions in the national food supply (especially meat) are diminishing, or are expected to imminently diminish, the food supply in their communities. They request the Board authorize, on an emergency basis, limited hunts near their communities to ensure they have sufficient food.

The Board wants to respond expeditiously to these requests and has taken initial steps to delegate authority to make independent determinations on these requests to the appropriate local federal land managers. The delegated authority would be within limited parameters and would require the manager to consult with the Emergency Operations Center and the Alaska Department of Fish and Game, among others. The Board expects to continue to receive requests as the pandemic continues. The delegations of authority would be similar to delegations of authority already in place for fisheries-related actions, which allow local managers to open or close fishing seasons in response to quickly changing conditions.

### Issue:

The Federal Subsistence Board has received twelve (11 hunting and 1 fishing) requests to date from communities requesting emergency openings near their communities to mitigate food insecurity and

unmet nutritional needs resulting from the COVID-19 pandemic. The Board expects to receive more requests as the pandemic continues. Requesters indicate pandemic-related reductions in freight service bringing food and other supplies to their communities, restrictions on travel (including mandatory 14-day quarantines for travelers), rural residents' reluctance to travel to hub communities where they would be exposed to COVID-19 and potentially bring it back to their communities (which generally have limited medical facilities, if any), and community closures to reduce exposure to visitors who may bring in COVID-19. Disruptions in the national commercial meat supply are diminishing, or are expected to diminish, the food supply in remote communities. These requests have been augmented by repeated public testimony at the Board's April 20-24, 2020 public meeting, and by written comments, indicating certain food lines have been interrupted to such a degree that a number of remote communities are already facing the prospect of severe shortages of protein staples.<sup>1</sup>

After discussions with FEMA, the Alaska Emergency Operations Center (EOC), Alaska Department of Fish and Game (ADFG), subsistence users, and other stakeholders, the Board is considering using its authorities at 36 CFR 242.19 and 50 CFR 100.19 to open targeted hunts of moose, deer, and caribou to address food shortages or supply chain disruptions in rural Alaska during the COVID-19 emergency. These openings would be accomplished by delegation of Board authority to designated DOI and USDA field managers, who would base opening decisions on direct coordination with the Office of Subsistence Management, EOC, and ADFG. These openings are intended to be temporary in nature to resolve localized risks to public safety and are designed to assist the joint State/FEMA recovery efforts during the Presidential COVID-19 disaster declaration in Alaska.

### **Scope and Authorities:**

The remainder of this memorandum further describes the Board's mandate and authorities as well as the parameters under which additional hunting or fishing could be authorized in response to the crisis. As detailed below, such emergency hunting or fishing opportunities, if any, would be made available to specific rural communities only under limited circumstances and in response to specific conditions following additional consultation with the State of Alaska Department of Fish and Game and the Unified Command Mass Care Group.<sup>2</sup> A draft of the Delegation of Authority Letter is attached.

Title VIII of the Alaska National Interest Lands Conversation Act of 1980 (ANILCA), established a priority for the taking of wild renewable resources, including fish and wildlife, on federal public lands in Alaska for non-wasteful subsistence uses by rural Alaska residents.<sup>3</sup> In 1990, the Secretaries of the Interior and Agriculture established the Federal Subsistence Board and delegated to it their respective

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<sup>1</sup> At a telephonic public meeting of the Federal Subsistence Board on April 20-23, the Board heard from several tribal leaders that their villages had submitted requests for additional hunting opportunities to the State of Alaska, but all of those requests had been rejected. Tribal leaders did not indicate whether the State had provided rationale for the denials.

<sup>2</sup> On April 21, the Regional Solicitor's Office sent an email to the Mass Care Group offering to open lines of communication between that group and the Federal Subsistence Management Program to allow for consultation prior to making any COVID-related decisions. In the initial reply to the Mass Care Group's response that there were no food security issues in Alaska at the time, SOL offered to share newly acquired information to the contrary received during the April Board meeting. SOL also reached out to FEMA which directed the Board to the State EOC and Mass Care Group.

<sup>3</sup> 16 U.S.C. §§ 3113-4.

authority to implement the subsistence priority.<sup>4</sup> The Board receives input from ten regional advisory councils, which ANILCA required to be established in each subsistence resource region and to be comprised of residents of that region with local knowledge of subsistence uses.<sup>5</sup>

In enacting Title VIII of ANILCA, Congress recognized subsistence uses by rural residents of public lands in Alaska is “essential” to, among other things, the “physical and economic existence” of those rural residents.<sup>6</sup> Congress further recognized that “the situation in Alaska is unique in that, in most cases, no practical alternative means are available to replace the food supplies and other items gathered from fish and wildlife which supply rural residents dependent on subsistence uses.”<sup>7</sup> The ongoing global pandemic has already precipitated government-mandated travel restrictions, shortages of key items at commercial outlets, and other challenging circumstances making it even more difficult for rural residents to provide food and other necessary items for themselves, their families, and their communities. The Board recognizes the resulting risks to public safety and would issue any delegations of authority as a proactive means of facilitating timely consideration of all food-security-related emergency special action proposals that may arise in rural Alaska.

### **Public Safety Finding:**

Current regulations give the Board the ability, in emergency situations, to immediately open, close, or modify hunting or fishing opportunities without engaging in notice and comment rulemaking.<sup>8</sup> Such actions may be taken only after consultation with the State of Alaska and the chair of the applicable regional advisory council(s) and may not exceed 60 days in duration.<sup>9</sup> This authority stems from the Board’s regulations, which state in relevant part that:

In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses.<sup>10</sup>

The Board also has the option to re-delegate this authority to DOI or USDA agency field managers.<sup>11</sup> The Board exercises this option on a regular basis, typically by issuing a letter of delegation to the manager which allows them, after consultation with the State and relevant advisory council chair, to set, on an emergency or temporary basis, harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife

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<sup>4</sup> 50 C.F.R. § 100.10(d)(4). The voting members of the Board include the regional and state directors of five federal land management agencies (FWS, BLM, NPS, BIA, and USDA Forest Service) and three rural residents of Alaska.

<sup>5</sup> 16 U.S.C. § 3115(a)-(c).

<sup>6</sup> *Id.* at § 3111(1).

<sup>7</sup> *Id.* at § 3111(2).

<sup>8</sup> 50 C.F.R. § 100.19(a).

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at § 100.10(d)(6). *See also* 200 DM 2.1 (allowing for the redelegation of authority and stating that “[a]uthority should be delegated to the lowest levels in the organization to better address issues and strengthen communications”).



harvest seasons within frameworks established by the Board.<sup>12</sup>

### **Current Actions:**

On April 9, 2020, the Board, following consultation with the Solicitor's Office, voted to authorize a process for sending letters of delegation to agency field managers to allow them to open, through reliance on local knowledge and on an expedited basis, hunting and fishing opportunities in response to any demonstrated COVID-19-related emergency situation relating to food security that rises to the level of constituting a threat to public safety. Such openings would not exceed 60 days in duration and must not constitute a threat to the viability of the relevant fish or wildlife resource. By the terms of the letter, these delegations of authority will sunset on June 1, 2021. The managers would not be given any authority to close hunting or fishing opportunities under state law.

While the Board has approved the concept of issuing these COVID-19-related delegation letters, it has not issued any such letters to date. If no letters are issued in a timely manner, then it will fall to the Board to make decisions on each of the emergency proposals, which can be accomplished either by e-mail or by teleconference on the record.

A few key points regarding this issue bear emphasis:

- Based on discussions with and public testimony proffered by residents of Alaska, as well as the Alaska Governor's decision to limit travel between communities, it is clear that certain supply lines within the state have disrupted and that the potential exists for this to result in significant threats to food security and public safety.
- No COVID-19-related action will be taken by the Federal Subsistence Board or their delegated agent if the requested hunting or fishing opportunity threatens the viability of the resource or in the absence of a demonstrable and imminent threat to public safety.
- Any actions so taken will be temporary in nature and will not remain in effect beyond the time that the threat to public safety has passed.
- No action will be taken by the Federal Subsistence Board or their delegated agent to open additional hunting or fishing opportunities prior to consultation with the ADFG and confirmation of need with the State of Alaska Unified Command Mass Care Group.

If there are additional questions that are not answered by this memorandum, please contact me, Thomas Doolittle, Deputy Assistant Regional Director for the Office of Subsistence Management, or Kenneth Lord, Assistant Regional Solicitor, Alaska Region.

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<sup>12</sup> 50 C.F.R. § 100.10(d)(6). Regulations draw a distinction between an "emergency special action," which can be made immediately but is limited in duration to 60 days, and a "temporary special action," which can be longer in duration but requires more procedural steps prior to implementation, including a public hearing.

## ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

Worker, Suzanne B <suzanne\_worker@fws.gov>

Thu 4/9/2020 3:17 PM

**To:** Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>  
**Cc:** Debenham, Rosalie A <Rosalie.Debenham@bia.gov>; Lind, Orville OL <orville\_lind@fws.gov>; Petrivelli, Patricia J. <Patricia.Petrivelli@bia.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Damberg, Carol B <carol\_damberg@fws.gov>; Pendergast, Kevin J <kpendergast@blm.gov>; Chen, Glenn <Glenn.Chen@bia.gov>; Ream, Joshua T <joshua\_ream@nps.gov>; Burns, Casey T <ctburns@blm.gov>; Whitford, Thomas -FS <thomas.whitford@usda.gov>; Tankersley, Yolanda J <Yolanda\_Tankersley@nps.gov>; Frerich, Lucille A <lucille\_frerich@fws.gov>; Penny Bullingham <pennyabullingham@fs.fed.us>; Frost, Eileen A <efrost@blm.gov>; Peterson, Vanessa Y <Vanessa.Peterson@bia.gov>; Lord, Kenneth M <Ken.Lord@sol.doi.gov>; Routhier, Michael P <michael.routhier@sol.doi.gov>; Jim Ustasiewski <jim.ustasiewski@ogc.usda.gov>

 1 attachments (21 KB)

COVID DAL\_FINAL\_MASTER\_ISC\_FSB.docx;

Hello Board members,

As you've likely heard, OSM has received several special action requests that are associated with pandemic-related food security concerns. In anticipation that we will receive an influx of such requests, we have developed a streamlined process for handling such requests. Our intent is to improve our capacity to respond quickly by delegating these decisions directly to the field.

If approved, here's how it will work:

- For valid, pandemic related requests, OSM will not initiate our standard analysis and review process.
- A Delegation of Authority letter to the relevant Federal manager will be drafted, based on the attached template. The letter limits management authority to very specific situations but authorizes a broad range of management tools. It also contains standard language requiring consideration of the views of council chairs, state and federal managers, etc.
- Regulatory actions taken under this authority are limited to 60 days or less.
- The designated in-season manager could defer particularly contentious decisions back to the Board.
- Non-pandemic related special action requests will be handled by OSM using our established processes for Temporary and Emergency actions.

Because it is an administrative action, this decision does not need to be made at a public meeting. We are requesting that you **respond to this email by COB April 14 and indicate whether or not you support the approach outlined above.** If the Board feels this is something that needs to be discussed as a group, we can arrange a short meeting next week, or you we can find a time to discuss it at the April 20-23 meeting.

Thanks much everyone. Take care.

Suzanne

--

Suzanne Worker

0483-FSB

Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
Office: 907.786.3677  
Mobile: 907.717.5039

**[EXTERNAL] RE: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Charles Brower <[charles.brower@nvbarrow.net](mailto:charles.brower@nvbarrow.net)>

Tue 4/14/2020 8:50 AM

To: Worker, Suzanne B <[suzanne\\_worker@fws.gov](mailto:suzanne_worker@fws.gov)>

Ok , I support

---

**From:** Worker, Suzanne B <[suzanne\\_worker@fws.gov](mailto:suzanne_worker@fws.gov)>

**Sent:** Monday, April 13, 2020 2:57 PM

**To:** Charles Brower <[charles.brower@nvbarrow.net](mailto:charles.brower@nvbarrow.net)>

**Subject:** Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

Hi Charlie,

It sounds like maybe you've weighed in on this through informal channels. Can you respond to this email so we have your vote on the record?

Thanks much! Hope your and your community are faring OK during these strange times.

Suzanne

--

Suzanne Worker

Acting Subsistence Policy Coordinator

Office of Subsistence Management

U.S. Fish and Wildlife Service

Anchorage, AK

Office: 907.786.3677

Mobile: 907.717.5039

---

**From:** Worker, Suzanne B

**Sent:** Thursday, April 9, 2020 3:17 PM

**To:** Detwiler, Susan K <[sue\\_detwiler@fws.gov](mailto:sue_detwiler@fws.gov)>; Striker, Donald <[Don\\_Striker@nps.gov](mailto:Don_Striker@nps.gov)>; Rhonda Pitka <[rhondapitka2@gmail.com](mailto:rhondapitka2@gmail.com)>; Padgett, Chad B <[cpadgett@blm.gov](mailto:cpadgett@blm.gov)>; Anthony Christianson <[lil\\_hagoo@yahoo.com](mailto:lil_hagoo@yahoo.com)>; Peltola, Eugene R <[Eugene.Peltola@bia.gov](mailto:Eugene.Peltola@bia.gov)>; Siekaniec, Greg E <[greg\\_siekaniec@fws.gov](mailto:greg_siekaniec@fws.gov)>; Doolittle, Thomas C <[thomas\\_doolittle@fws.gov](mailto:thomas_doolittle@fws.gov)>; Charles Brower <[charles.brower@nvbarrow.net](mailto:charles.brower@nvbarrow.net)>; Schmid David E <[dschmid@fs.fed.us](mailto:dschmid@fs.fed.us)>

**Cc:** Debenham, Rosalie A <[Rosalie.Debenham@bia.gov](mailto:Rosalie.Debenham@bia.gov)>; Lind, Orville OL <[orville\\_lind@fws.gov](mailto:orville_lind@fws.gov)>; Petrivelli, Patricia J. <[Patricia.Petrivelli@bia.gov](mailto:Patricia.Petrivelli@bia.gov)>; Doolittle, Thomas C <[thomas\\_doolittle@fws.gov](mailto:thomas_doolittle@fws.gov)>; Damberg, Carol B <[carol\\_damberg@fws.gov](mailto:carol_damberg@fws.gov)>; Pendergast, Kevin J <[kpendergast@blm.gov](mailto:kpendergast@blm.gov)>; Chen, Glenn <[Glenn.Chen@bia.gov](mailto:Glenn.Chen@bia.gov)>; Ream, Joshua T <[joshua\\_ream@nps.gov](mailto:joshua_ream@nps.gov)>; Burns, Casey T <[ctburns@blm.gov](mailto:ctburns@blm.gov)>; Whitford, Thomas -FS <[thomas.whitford@usda.gov](mailto:thomas.whitford@usda.gov)>; Tankersley, Yolanda J <[Yolanda\\_Tankersley@nps.gov](mailto:Yolanda_Tankersley@nps.gov)>; Frerich, Lucille A <[lucille\\_frerich@fws.gov](mailto:lucille_frerich@fws.gov)>; Penny Bullingham <[pennyabullingham@fs.fed.us](mailto:pennyabullingham@fs.fed.us)>; Frost, Eileen A <[efrost@blm.gov](mailto:efrost@blm.gov)>; Peterson, Vanessa Y <[Vanessa.Peterson@bia.gov](mailto:Vanessa.Peterson@bia.gov)>; Lord, Kenneth M <[Ken.Lord@sol.doi.gov](mailto:Ken.Lord@sol.doi.gov)>; Routhier, Michael P <[michael.routhier@sol.doi.gov](mailto:michael.routhier@sol.doi.gov)>; Jim Ustasiewski <[jim.ustasiewski@ogc.usda.gov](mailto:jim.ustasiewski@ogc.usda.gov)>

**Subject:** ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

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Thanks much everyone. Take care.

Suzanne

--

Suzanne Worker  
Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
Office: 907.786.3677  
Mobile: 907.717.5039

**[EXTERNAL] Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Anthony Christianson <lil\_hagoo@yahoo.com>

Mon 4/13/2020 10:11 AM

To: Worker, Suzanne B <suzanne\_worker@fws.gov>

I approve this.

On Thursday, April 9, 2020, 03:17:33 PM AKDT, Worker, Suzanne B <suzanne\_worker@fws.gov> wrote:

Hello Board members,

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Suzanne

--

Suzanne Worker  
Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
Office: 907.786.3677  
Mobile: 907.717.5039

**RE: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Padgett, Chad B <cpadgett@blm.gov>

Fri 4/10/2020 1:45 PM

**To:** Striker, Donald <Don\_Striker@nps.gov>; Worker, Suzanne B <suzanne\_worker@fws.gov>; Detwiler, Susan K <sue\_detwiler@fws.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>  
**Cc:** Debenham, Rosalie A <Rosalie.Debenham@bia.gov>; Lind, Orville OL <orville\_lind@fws.gov>; Petrivelli, Patricia J. <Patricia.Petrivelli@bia.gov>; Damberg, Carol B <carol\_damberg@fws.gov>; Pendergast, Kevin J <kpendergast@blm.gov>; Chen, Glenn <Glenn.Chen@bia.gov>; Ream, Joshua T <joshua\_ream@nps.gov>; Burns, Casey T <ctburns@blm.gov>; Whitford, Thomas -FS <thomas.whitford@usda.gov>; Tankersley, Yolanda J <Yolanda\_Tankersley@nps.gov>; Frerich, Lucille A <lucille\_frerich@fws.gov>; Penny Bullingham <pennyabullingham@fs.fed.us>; Frost, Eileen A <efrost@blm.gov>; Peterson, Vanessa Y <Vanessa.Peterson@bia.gov>; Lord, Kenneth M <Ken.Lord@sol.doi.gov>; Routhier, Michael P <michael.routhier@sol.doi.gov>; Jim Ustasiewski <jim.ustasiewski@ogc.usda.gov>

BLM Supports

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**From:** Striker, Donald <Don\_Striker@nps.gov>

**Sent:** Friday, April 10, 2020 12:55 PM

**To:** Worker, Suzanne B <suzanne\_worker@fws.gov>; Detwiler, Susan K <sue\_detwiler@fws.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>  
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**Subject:** Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

NPS fully supports...

Don Striker  
Acting Regional Director  
NPS Region 11

Mobile: 907-227-6163

---

**From:** Worker, Suzanne B <[suzanne\\_worker@fws.gov](mailto:suzanne_worker@fws.gov)>

**Sent:** Thursday, April 9, 2020 3:17 PM

**To:** Detwiler, Susan K <[sue\\_detwiler@fws.gov](mailto:sue_detwiler@fws.gov)>; Striker, Donald <[Don\\_Striker@nps.gov](mailto:Don_Striker@nps.gov)>; Rhonda Pitka <[rhondapitka2@gmail.com](mailto:rhondapitka2@gmail.com)>; Padgett, Chad B <[cpadgett@blm.gov](mailto:cpadgett@blm.gov)>; Anthony Christianson <[lil\\_hagoo@yahoo.com](mailto:lil_hagoo@yahoo.com)>; Peltola, Eugene R <[Eugene.Peltola@bia.gov](mailto:Eugene.Peltola@bia.gov)>; Siekaniec, Greg E <[greg\\_siekaniec@fws.gov](mailto:greg_siekaniec@fws.gov)>; Doolittle, Thomas C <[thomas\\_doolittle@fws.gov](mailto:thomas_doolittle@fws.gov)>; Charles Brower <[charles.brower@nvbarrow.net](mailto:charles.brower@nvbarrow.net)>; Schmid David E <[dschmid@fs.fed.us](mailto:dschmid@fs.fed.us)>

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0488-FSB  
<[carol\\_damberg@fws.gov](mailto:carol_damberg@fws.gov)>; Pendergast, Kevin J <[kpendergast@blm.gov](mailto:kpendergast@blm.gov)>; Chen, Glenn <[Glenn.Chen@bia.gov](mailto:Glenn.Chen@bia.gov)>;  
Ream, Joshua T <[joshua\\_ream@nps.gov](mailto:joshua_ream@nps.gov)>; Burns, Casey T <[ctburns@blm.gov](mailto:ctburns@blm.gov)>; Whitford, Thomas -FS  
<[thomas.whitford@usda.gov](mailto:thomas.whitford@usda.gov)>; Tankersley, Yolanda J <[Yolanda\\_Tankersley@nps.gov](mailto:Yolanda_Tankersley@nps.gov)>; Frerich, Lucille A  
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Peterson, Vanessa Y <[Vanessa.Peterson@bia.gov](mailto:Vanessa.Peterson@bia.gov)>; Lord, Kenneth M <[Ken.Lord@sol.doi.gov](mailto:Ken.Lord@sol.doi.gov)>; Routhier, Michael P  
<[michael.routhier@sol.doi.gov](mailto:michael.routhier@sol.doi.gov)>; Jim Ustasiewski <[jim.ustasiewski@ogc.usda.gov](mailto:jim.ustasiewski@ogc.usda.gov)>  
**Subject:** ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

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Thanks much everyone. Take care.  
Suzanne

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Suzanne Worker  
Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
Office: 907.786.3677  
Mobile: 907.717.5039



**Re: [EXTERNAL] Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Peltola, Eugene R <Eugene.Peltola@bia.gov>

Thu 4/9/2020 3:34 PM

To: Worker, Suzanne B <suzanne\_worker@fws.gov>

Cc: Rhonda Pitka <rhondapitka2@gmail.com>; Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dtschmid@fs.fed.us>; Debenham, Rosalie A <Rosalie.Debenham@bia.gov>; Lind, Orville OL <orville\_lind@fws.gov>; Petrivelli, Patricia J. <Patricia.Petrivelli@bia.gov>; Damberg, Carol B <carol\_damberg@fws.gov>; Pendergast, Kevin J <kpendergast@blm.gov>; Chen, Glenn <Glenn.Chen@bia.gov>; Ream, Joshua T <joshua\_ream@nps.gov>; Burns, Casey T <ctburns@blm.gov>; Whitford, Thomas -FS <thomas.whitford@usda.gov>; Tankersley, Yolanda J <Yolanda\_Tankersley@nps.gov>; Frerich, Lucille A <Lucille\_frerich@fws.gov>

As a whole I think it may work, although I have grave concerns about a small fraction of our land managers with a current delegation of authority, then potentially expanding authority.

If they took an inappropriate action, or did not act at all, it could potentially leave the FSP with a legal liability. Recent precedent has led me to this concern.

Gene

Sent from my iPhone

On Apr 9, 2020, at 3:25 PM, Rhonda Pitka <rhondapitka2@gmail.com> wrote:

Yes, I approve of this approach. Thanks, Rhonda

On Thu, Apr 9, 2020 at 3:17 PM Worker, Suzanne B <[suzanne\\_worker@fws.gov](mailto:suzanne_worker@fws.gov)> wrote:  
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Suzanne

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Suzanne Worker  
Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
Office: 907.786.3677  
Mobile: 907.717.5039

--

Rhonda Pitka  
PO BOX 24028  
Beaver, AK 99724  
Office: 907-628-6126

[EXTERNAL] Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

Rhonda Pitka <rhondapitka2@gmail.com>

Thu 4/9/2020 3:25 PM

To: Worker, Suzanne B <suzanne\_worker@fws.gov>

Cc: Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>; Debenham, Rosalie A <Rosalie.Debenham@bia.gov>; Lind, Orville OL <orville\_lind@fws.gov>; Petrivelli, Patricia J. <Patricia.Petrivelli@bia.gov>; Damberg, Carol B <carol\_damberg@fws.gov>; Pendergast, Kevin J <kpendergast@blm.gov>; Chen, Glenn <Glenn.Chen@bia.gov>; Ream, Joshua T <joshua\_ream@nps.gov>; Burns, Casey T <ctburns@blm.gov>; Whitford, Thomas -FS <thomas.whitford@usda.gov>; Tankersley, Yolanda J <Yolanda\_Tankersley@nps.gov>; Frerich, Lucille A <Lucille\_frerich@fws.gov>

Yes, I approve of this approach. Thanks, Rhonda

On Thu, Apr 9, 2020 at 3:17 PM Worker, Suzanne B <[suzanne\\_worker@fws.gov](mailto:suzanne_worker@fws.gov)> wrote:

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Thanks much everyone. Take care.  
Suzanne

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Suzanne Worker  
Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
U.S. Fish and Wildlife Service

0492-FSB

Anchorage, AK

Office: 907.786.3677

Mobile: 907.717.5039

--

**Rhonda Pitka**

**PO BOX 24028**

**Beaver, AK 99724**

**Office: 907-628-6126**

**[EXTERNAL] RE: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Schmid, David - FS <david.schmid@usda.gov>

Thu 4/9/2020 3:59 PM

To: Rhonda Pitka <rhondapitka2@gmail.com>; Worker, Suzanne B <suzanne\_worker@fws.gov>  
Cc: Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Padgett, Chad B <cpadgett@blm.gov>; lil\_hagoo@yahoo.com <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Debenham, Rosalie A <Rosalie.Debenham@bia.gov>; Lind, Orville OL <orville\_lind@fws.gov>; Petrivelli, Patricia J. <Patricia.Petrivelli@bia.gov>; Damberg, Carol B <carol\_damberg@fws.gov>; Pendergast, Kevin J <kpendergast@blm.gov>; Chen, Glenn <Glenn.Chen@bia.gov>; Ream, Joshua T <joshua\_ream@nps.gov>; Burns, Casey T <ctburns@blm.gov>; Whitford, Thomas -FS <thomas.whitford@usda.gov>; Tankersley, Yolanda J <Yolanda\_Tankersley@nps.gov>; Frerich, Lucille A <lucille\_frerich@fws.gov>; Bullingham, Penny A -FS <penny.a.bullingham@usda.gov>

I support the approach. Thanks, Dave



**David Schmid**  
**Regional Forester**

**Forest Service**  
**Alaska Region**

**p: 907-586-8775**

**c: 406-273-8573**

[david.schmid@usda.gov](mailto:david.schmid@usda.gov)

709 West 9th Street

Juneau, AK 99801

[www.fs.fed.us](http://www.fs.fed.us)



**Caring for the land and serving people**

**From:** Rhonda Pitka [mailto:rhondapitka2@gmail.com]

**Sent:** Thursday, April 9, 2020 3:25 PM

**To:** Worker, Suzanne B <suzanne\_worker@fws.gov>

**Cc:** Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Padgett, Chad B <cpadgett@blm.gov>; lil\_hagoo@yahoo.com; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid, David - FS <david.schmid@usda.gov>; Debenham, Rosalie A <Rosalie.Debenham@bia.gov>; Lind, Orville OL <orville\_lind@fws.gov>; Petrivelli, Patricia J. <Patricia.Petrivelli@bia.gov>; Damberg, Carol B <carol\_damberg@fws.gov>; Pendergast, Kevin J <kpendergast@blm.gov>; Chen, Glenn <Glenn.Chen@bia.gov>; Ream, Joshua T <joshua\_ream@nps.gov>; Burns, Casey T <ctburns@blm.gov>; Whitford, Thomas -FS <thomas.whitford@usda.gov>; Tankersley, Yolanda J <Yolanda\_Tankersley@nps.gov>; Frerich, Lucille A <lucille\_frerich@fws.gov>; Bullingham, Penny A -FS <penny.a.bullingham@usda.gov>; Frost, Eileen A <efrost@blm.gov>; Peterson, Vanessa Y <Vanessa.Peterson@bia.gov>; Lord, Kenneth M <Ken.Lord@sol.doi.gov>; Routhier, Michael P <michael.routhier@sol.doi.gov>; Ustasiewski, James - OGC, Juneau, AK <jim.ustasiewski@usda.gov>

**Subject:** Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

Yes, I approve of this approach. Thanks, Rhonda



On Thu, Apr 9, 2020 at 3:17 PM Worker, Suzanne B <[suzanne\\_worker@fws.gov](mailto:suzanne_worker@fws.gov)> wrote:

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Suzanne

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Beaver, AK 99724  
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0495-FSB

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**Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Siekaniiec, Greg E &lt;greg\_siekaniiec@fws.gov&gt;

Thu 4/9/2020 4:56 PM

**To:** Worker, Suzanne B <suzanne\_worker@fws.gov>; Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>

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I'm supportive of moving the decision process as close to the users as we can. The federal land managers are in the best position to be responsive and part of a coordinated approach to answering the requests for emergency action.

Greg

Get [Outlook for iOS](#)**From:** Worker, Suzanne B <suzanne\_worker@fws.gov>**Sent:** Thursday, April 9, 2020 6:17:24 PM

**To:** Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniiec, Greg E <greg\_siekaniiec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>

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0497-FSB

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**Re: ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process**

Striker, Donald <Don\_Striker@nps.gov>

Fri 4/10/2020 12:54 PM

**To:** Worker, Suzanne B <suzanne\_worker@fws.gov>; Detwiler, Susan K <sue\_detwiler@fws.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>  
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NPS fully supports...

Don Striker  
Acting Regional Director  
NPS Region 11

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**From:** Worker, Suzanne B <suzanne\_worker@fws.gov>

**Sent:** Thursday, April 9, 2020 3:17 PM

**To:** Detwiler, Susan K <sue\_detwiler@fws.gov>; Striker, Donald <Don\_Striker@nps.gov>; Rhonda Pitka <rhondapitka2@gmail.com>; Padgett, Chad B <cpadgett@blm.gov>; Anthony Christianson <lil\_hagoo@yahoo.com>; Peltola, Eugene R <Eugene.Peltola@bia.gov>; Siekaniec, Greg E <greg\_siekaniec@fws.gov>; Doolittle, Thomas C <thomas\_doolittle@fws.gov>; Charles Brower <charles.brower@nvbarrow.net>; Schmid David E <dschmid@fs.fed.us>

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**Subject:** ACTION REQUIRED by 4/14: FSB approval of streamlined Special Action process

Hello Board members,

As you've likely heard, OSM has received several special action requests that are associated with pandemic-related food security concerns. In anticipation that we will receive an influx of such requests, we have developed a streamlined process for handling such requests. Our intent is to improve our capacity to respond quickly by delegating these decisions directly to the field.

If approved, here's how it will work:



0499-FSB

- For valid, pandemic related requests, OSM will not initiate our standard analysis and review process.
- A Delegation of Authority letter to the relevant Federal manager will be drafted, based on the attached template. The letter limits management authority to very specific situations but authorizes a broad range of management tools. It also contains standard language requiring consideration of the views of council chairs, state and federal managers, etc.
- Regulatory actions taken under this authority are limited to 60 days or less.
- The designated in-season manager could defer particularly contentious decisions back to the Board.
- Non-pandemic related special action requests will be handled by OSM using our established processes for Temporary and Emergency actions.

Because it is an administrative action, this decision does not need to be made at a public meeting. We are requesting that you **respond to this email by COB April 14 and indicate whether or not you support the approach outlined above.** If the Board feels this is something that needs to be discussed as a group, we can arrange a short meeting next week, or you we can find a time to discuss it at the April 20-23 meeting.

Thanks much everyone. Take care.  
Suzanne

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**NWX-DOI-FISH & WILDLIFE**

**Moderator: Subsistence Management**

**June 22, 2020**

**3:36 pm CT**

Coordinator: Welcome and thank you for standing by. All participants will be able to listen only until the question-and-answer session of today's conference. At that time if you would like to ask a question you may do so by pressing star then 1 and recording your first and last name. Today's conference is being recorded. If you have any objections you may disconnect at this time. I would now like to turn the call over to your host for today, Ms. Sue Detwiler, Assistant Regional Director. Ma'am you may begin.

Sue Detwiler Okay thank you operator. My name is Sue Detwiler, the new Assistant - relatively new Assistant Regional Director for the Office of Subsistence Management with Fish & Wildlife.

I've been in the position for a couple of months now and so this is my first board meeting, and I am replacing Tom Doolittle who has done a great job these last almost two years in the position of Assistant Regional Director.

So Tom is also online during this meeting as is Lisa Maas who is now also replacing (Suzanne Worker) as the Policy Coordinator, so they're both online along with some other folks from Office of Subsistence Management who will be here as support and also providing presentations.

(Theo): Yes. That is correct. And once again, keep in mind that any of these COVID-19 type special actions, you know, the delegation of authority's been issued but the in-season or land managers would still have to, you know, take action on them.

Gregory Sickaniec: Right.

(Theo): And, you know, the delegation letter is clear when it comes down to, you know, issues referenced, you know, conservation concerns and things like that. So it's not like a given that all of these are automatically going to be approved because there could very well be, you know, conservation issues and the land manager, you know, or in-season manager simply, you know, does not see that as being a viable option based on conservation concerns

Gregory Sickaniec: Okay. Yes. Thank you, (Theo).

(Theo): You're welcome.

Man: All right. (Reno) of (Oregon) for discussion and deliberation.

Man: Very (unintelligible) I'm prepared for a motion.

(Bill): Hello.

Man: (Bill)?

Sue Detwiler: Yes. So this is Sue. I didn't hear a motion but it's my understanding that the board does not need to take affirmative action at this point if it wants the situation to remain the status quo which is that COVID related special actions would not count towards other harvest limits.

emergency hunt or an individual hunt that doesn't also (qualified users) that would probably expect how the in-season manager would want to administer that hunt.

Because if it's - if the board takes a (unintelligible) and this is a cumulative harvest limit then the in-season manager doesn't really need to keep track of which individuals in that community are harvesting the moose for example.

But if these harvest limits during the emergency seasons do affect an individuals, you know, limits for the entire year then they would need to keep track of those individuals that are harvesting for the community.

(Theo): Yes. This is (Theo). Let me add this.

Regardless of which technique the in-season or land manager is going to use. There's going to be a record of the fish and/or wildlife that is harvested. The issue - the point of contention would be for that land manager to - if it's going to affect the person's ability to hunt in later, regular hunt or fishing seasons, the in-season manager would have to, you know, track not just the actual (take) - the numbers of animals. But the individuals who harvested that.

For example, if you decide that - yes, it's going to be the individuals who harvested now is not going to be able to harvest, you know, in September or October or later on in the season. Then yes. That's going to be an additional thing that has to be tracked because obviously than individual would not be eligible for a later permit in the regular season.

But yes - the take of fish and/or wildlife, the actual numbers, the biological data, will be recorded no matter what.

and five deer per month on Forest Service land. As you know, your delegation letter granted me authority for one year, but only 60 days within that year. So my initial plan was to give him a permit for one month for two moose, bull moose and five antler deer bucks. And then see how that went before I took action on the second month.

In that delegation letter, I was supposed to talk with the Fish and Game. Consult with them. We did that. We have not received any response back from them. I do not believe there is any conservation issues. Actually the conversation issue actually the harvest of moose in Unit 3 and 1B and portions of 1C, I think last year was 130 animals on the (Kupreanof) Island which (Warecape) is located. I think there were 50 moose taken off that island from Rocky Path to Dunkin Canal and the (Linderbug) Peninsula and actually I think around 20 animals form the Kake Road system. Actually deer have actually increased also in that area. Actually (Joel) told me that the deer population in the last few years has been better than it ever has been. So that's a good stroke. And there's probably a lot of elements that play into that.

Part of my - also in the letter, I was supposed to consult with the Alaska Unified Command Mass Care Group to see if they also agreed that there was not or that there was a good issue in Kake. They said that they were unaware of any food issues, food security issues in Kake. And I received that letter from them or email on the fifth. Subsequently, I talked to them a couple different times, kind of actually asking them well are you - were you unaware because you haven't talked to them. Were you unaware because of what you heard? I was just kind of interested in the process. That was on June 5 on a Friday.

On the 8th, I talked with him and then (Desire Chambers) who is the food security supervisor and they - after discussions with them and discussions with the Salvation Army and trying to get a hold of Kake. I guess they sent a



questionnaire to Kake to ask some of these questions. They never heard back from them. So they stood firm on their statement that they're unaware of any food security issues at Kake.

So basically at that point, as my delegation letter says, I think the last, one of the last sentences says in the event that the Alaska Unified from their Command Mass Care group does not confirm the need for this special action. You will defer this special action back to the board. And basically, that's where the Chairman. So that's all I have. If you have any questions for me, please ask. Thank you.

Man: Good summary there. Any questions from the board?

Man: Yes, I was just - sorry, I'm trying to trip up on my words here about this one. Because, you know, this is a pretty important topic about the food security and I'm glad that you kind of made several attempts to try to get an answer to what criteria they're using to figure out if there's a food security issue in Kake or not. Because, you know, just being a local (unintelligible), Chief Resident myself, I know that food security has been an issue in Southeast Alaska for months. More so because of transportation problems that these rural communities with the rural highways has been basically the Alaskan (unintelligible) highway, no operating at high enough capacity that they had empty storage for months. They're not being able to get it in the cost of living and getting, you know, stuff into Kake. It's just, you know, it's exponentially higher for months if not a year. Due to that issue. And then we have this pandemic on top of that. I can see why there's a true hardship in Kake happening.

You know, but that's just my perception as a rural resident living in the area. You know, so I wish we could get a better set of criteria because if we do provide an opportunity as the federal board manager and then we have

(Bert Jackson): There's (Joel).

Man: Mr. (Jackson), are you on Mr. President?

(Bert Jackson): Yes, I am, Mr. Chair. Okay, yes, we're going through this special request here and you know we did develop now a semi-quasi policy out there hearing back that we have to run our stuff through this program to identify whether the food security issues are not. And, you know, there's some statements made about, you know, the process that unfolded up to that determination. And so I just, you know, wanted to get a little feedback or discussion out of Kake. I'll give you that opportunity to speak today.

(Joel Jackson): All right, thank you, Mr. (Chair). Like you all know, my name is (Joel Jackson). I'm the president of the Organized Village of Kake. When I started this process we did start having some problems securing meat for our village. You know, so it was a food security back then. We are still getting some meat. But I think like the Chairman said that, you know, it's hard to buy from the stores because the prices have went up. They went way up for meat especially. And our stores are still trying to fill their orders to where that everybody can get what they need. We're still on limits on like for instance paper towel and tissue paper and that kind of stuff, cleaning supply. But the meat that we're getting is processed meat. It's - and I'm not speaking ill of the store. They're doing the best they can. You know, it's processed meat. Nonetheless, it's not very good.

I mean I bought hamburger, the outside was pink. The inside was brown. And that was the last time I bought hamburger from the store. I don't even buy any other meat from the store at all unless it's frozen and, you know, comes direct from the factory. Then I buy a little bit. But right now, with the number climbing around us, right now I believe that we need the best quality meat that

we can get for our people, our elders and our tribal citizens. I mean they're used to eating that meat. I mean that's about the healthiest meat that you can get. And right now at this point, it's very critical that we supply this meat to them. So that they are healthy as they can be. Because with the number climbing, it went from 400 to over 700. You know, people in Alaska are affected by this COVID-19 virus. And it's all around us. It's all around all the small villages.

So, you know, right I'm concentrating. I'm trying to get them the best meat possible. We're trying to supply everybody in town with fresh fish. We believe in doing it ever since we started. You know, numerous people in town have pitched in and if they get, you know, a little bit more halibut or whatever, they give it out. You know, so we're trying to supplement the money that the - like my community we got about 85% unemployment. So, you know, it's important right now that we try to help our elders and tribal citizens. There's no disruption in the food chain other than at the vendors down south. We're not able to - the stores here are not able to secure everything that they ordered. Every order is limited.

So and hey, we got a ferry today. Wow, probably over half a year went by before we got a ferry. I mean, you know, I don't know when the next one will be. I know the communities around us, you know, they're hurting. And as well as Kake. Anxiety level and the frustration and, you know, people are scared. And the best way that I see and I've been telling my nephews and my grandsons that if you get too much. You hand it out. Give it to them. They said that will put a smile on their face.

And we need to lift our people up. So that's the whole things about us sharing. The concept of sharing has always been passed on to us. And, you know, that's very important right now. We're trying to hold each other up. And, you know, it's like I told Chad and he mentioned there's no shortage of moose or deer on

the island. The past couple of years have been phenomenal. We hardly have any people go to (unintelligible) where we used to have to go to get deer.

So, you know, we've always been conservationists. We never took too much of anything. We were always mindful in our practice as native people. That we are responsible for our fish and wildlife. Probably more so than anybody else in this world. Because we lived on this land for over 10,000 years. So we know what our people need. And I've been very mindful of including everybody and everything that I did starting from the fish and game to the forest service.

And then to you guys and I understand it went to the Department of the Interior and then went back down to (unintelligible). And then to the mass whatever thing. I never heard of it before. I don't know if anybody in our community heard of that before. So if they send out a questionnaire, the people would probably say what the heck is that? Who are these people?

You know, so it's - and I appreciate your time. And I'll leave it at that. Thank you.

Man: Thank you, Mr. (Jackson). Any questions from the board for Mr. (Jackson)? All right, hearing none, I thank you again, Mr. (Jackson) just wanted to, you know, just provide that opportunity for you to speak to the board on this specific topic and definitely the best deal in your community in these challenging times. And certainly broad that their cultural value system is such that we can take care of all the people to the best of their ability with, you know, our up and coming young subsistence users learning those traditional ways of sharing with their leaders and whatnot. So definitely appreciate your village and the way it's standing up in these trying times and making a difference for our people. So thank you.

We'll go ahead and continue on with the discussion here, the other board

And so, you know, I feel this is a real good step in the direction of maintaining the level of trust that we have already established. And, hopefully, it can build off of this and continue to provide opportunity for the membership. Thank you, guys, for the support on this. I think it's a very big deal.

Sue Detwiler: Sorry, I think -

Greg Sickaniec: Mr. Chair - Mr. Chair, this is Greg.

Tony Christianson: Greg, go ahead.

Greg Sickaniec: I was just going to ask - so under the information that was provided, there was a description of the explanation that the emergency action authorized it from a date of June 10 to August 10. Are we going to make adjustments to these dates based on our action today? And I just wanted to make sure that we are maintaining the expectation of this 30-day review by the in-season manager to determine the need for an additional 30 days. I just want to make sure that I'm comfortable with what we were - what we had on the table here.

Tony Christianson: Okay. Is there anybody on the Board that is not comfortable with the criteria as it is?

Dave Schmid: No, Mr. Chairman. This is Dave. My understand was that, you know, that date from the - it would be 30 days from the date here that the District Ranger in-season manager issues that to the Organized Village of Kake, and that's up to two moose and five deer for that 30 days and that he will re-evaluate at the end of that based on the conditions at that point, was my understanding.

Greg Sickaniec: This is Greg. I'm comfortable with that, from the date that the actual issuance of the permit starts that window.